

Protection of Personal Data

Annex No. 9 to the Library Rules of the National Library of the Czech Republic

In the area of the ensurance of the protection of natural persons with regard to the processing of their personal data at the workplaces of the National Library of the Czech Republic, the National Library of the Czech Republic (hereinafter referred to as the "**NL CR**") acts in accordandce with the provisions of the 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/ES (General Data Protection Regulation), known as GDPR (hereinafter referred to as the „ **Regulation**“) and the Act No. 110/2019, Coll., on the processing of personal data (hereinafter referred to as the "**Act on the processing of PD**").

In the processing of the personal data, the NL CR proceeds in accordance with the Regulations, the Act on the processing of PD, the Library Rules of the NL CR (hereinafter referred to as the „ **Library Rules**“), and other generally binding as well as internal regulations. Personal data are usually processed by the NL CR’s own employees by manually and by automated means, if not otherwise stated. The NL CR only processes accurate and updated personal data, and for this purpose it verifies some of them. The controller of the personal data is the National Library of the Czech Republic, a state-funded organization established by the Ministry of Culture of the Czech Republic, at the address Mariánské náměstí 190/5, 110 00 Praha 1, IČO (identification number of the organization) 00023221.

1. The Processed Personal Data

1.1. *The NL CR processes the personal data of its users in accordance with the Regulation and the Act on the processing of PD*

- A. within the framework of the contractual relationship between the NL CR and the registered user resulting from the registration, which is usually long-term and requires establishing the identity of the user (hereinafter referred to as the "**Registration**" and the "**Registered User**");
- B. within the framework of the relationship with the individual from the part of the public
 - i. on the basis of the provision of a service on a usually one-time request;
 - ii. on the basis of a contractual relationship based on a license authorization or cooperative relationship of the NL CR;
(hereinafter referred to as "**Other User**").
- C. within the framework of contractual relations with other institutions, to whose registered users the NL CR provides services (hereinafter referred to as "**Other User**");
- D. through a camera system with recording.

1.2. In the event that the NL CR provides the personal data of the Registered User and Other User to an external service provider or other data processor, it proceeds itself in accordance with the Regulation and the Act on the processing of PD, and at the same time it contractually binds the external provider or data processor to procede in accordance with the Regulation and the Act on the processing of PD.

1.3. In connection with making the content of electronic information resources available via remote access (online) to individuals from the public or to users whose access is managed by other libraries and legal entities on the basis of a contractual relationship with the NL CR, the NL CR processes the personal data of these persons or transfers the data of the Registered User or Other user to partner institutions, if the Registered User or Other User requests the service in question.

1.4. Unless otherwise stipulated in the terms and conditions of the individual services provided, and with the exception of cookies, the NL CR does not transfer any personal data of Registered Users or Other Users to the third countries outside the EU, nor to any recipients beyond the scope of fulfilling its legal

obligations or cooperation with external service providers in accordance with the GDPR and the Act on the processing of PD.

2. The Purpose of and Legal Basis for the Processing of Personal Data

2.1. The NL CR processes mandatory and other personal data. Personal data are processed mainly for the purpose of providing services and property protection, as well as for statistical, service, accounting and legal purposes. More information here:

Purpose	Legal Basis	Legitimate Interests
Providing services to Registered Users and Other Users	Fulfillment of the agreement, fulfillment of the legal obligation of the controller, consent of the data subject	---
Protection of the NL CR's property, library collections and information resources	Fulfillment of the legal obligation of the controller, legitimate interests of the controller	Protection of the property of the Czech Republic, or possibly third parties (licence holders)
Evaluation of satisfaction of Registered Users and Other Users	Legitimate interests of the controller, consent of the data subject	Improving services
Control of the quality of work of the NL CR employees	Legitimate interests of the controller, consent of the data subject	Improving services
Statistical evaluation of the activity of the NL CR, attendance, use of services incl. profiling	Legitimate interests of the controller	Improving services
Records of accounting operations, receivables and liabilities	Fulfillment of the contract, fulfillment of the legal obligation of the controller	---
Procedure in handling requests of Registered Users and Other Users	Consent of the data subject	---
Information about services provided by the NL CR, reader account etc.	Consent of the data subject, fulfillment of the agreement	---
Newsletter of the NL CR	Consent of the data subject	---
Answers to requests and communication with Registered Users or Other Users (especially via e-mail)	Fulfillment of the contract, legitimate interests of the controller	Improving services, user acquisition, support of the existing users

3. The Processing of Personal Data of the Registered User

3.1. Mandatory identification data of the Registered User:

- A. name and surname;
- B. date of birth;
- C. address of permanent residence;
- D. contact address in the CR, or within EU/EEA, if different from the permanent residence address;

- E. e-mail address in case of remote registration;
- F. type and number of personal document / BankID OID / data box ID;
- G. signature / advanced or qualified electronic signature.

3.2. Additional data of the Registered User:

- A. type and number of TP (severe disability), ZTP (extreme disability) or ZTP/P (extreme disability with the need for a guide) card, or proof of disability documentation that entitles to access special services;
- B. scan/photo or type and number of the card that entitles to discounts or other benefits based on the NL CR internal regulations or departmental regulations of the Ministry of Culture of the CR.

3.3. Other data of the Registered User:

- A. academic degree;
- B. telephone number;
- C. e-mail address in case of on-site registration.

3.4. Data of the Registered User according to paragraph 3.1. are processed by the NL CR on the basis of a contractual relationship with the Registered User and they are necessary for the Registration. A person who does not provide the NL CR with his/her personal data to this extent will not be registered by the NL CR, nor will he/she be issued with a reader card.

3.5. Data of the Registered User according to paragraph 3.2. are provided on the basis of the consent of the Registered User, while the data according to letter A are provided by the Registered User if he/she requires the provision of library services in the regime established for TP, or ZTP, or ZTP/P card holders, or for persons with disabilities, and the user will provide information according to letter B if he/she wants to claim a discount or other benefit.

3.6. Identification data of a person acting on behalf of the Registered User who holds a TP, or ZTP, or ZTP/P card are processed in a similar scope and structure as the mandatory identification data of the Registered User according to paragraph 3.1. above.

3.7. Data according to paragraph 3.3. are provided by the Registered User, if he/she wants to allow the NL CR to use these data for more effective communication with him/her, e.g. for informing about the status of the reader account, the status of orders, sending information about the history of borrowings, about services and changes in the operation of the library, or occasionally for informing about the provision of wider offer of (new) services and conducting a reader satisfaction survey.

3.8. Mandatory identification data of the Registered User are verified by the NL CR according to valid personal documents issued by public authorities (hereinafter referred to as "**Personal Documents**") to prove the identity of the Registered User. For citizens of the Czech Republic, such a document is usually a national identity card. Mandatory identification data of the Registered User according to paragraph 3.1. are verified by the NL CR in particular during the Registration, during the renewal of the Registration, when issuing a new reader card and possibly when any of the provided data has changed. In the case of concluding an Agreement for the provision of library and information services on the basis of the remote registration, the mandatory identification data of the applicant are verified in accordance with Part four of the Library Rules. Additional data of the Registered User according to paragraph 3.2. letter A) is verified by the NL CR at the moment when the Registered User requests the provision of services in the regime established for TP, or ZTP, or ZTP/P card holders, or for persons with a disability that entitles them to access special services, as well as when renewing the Registration. Identity verification is necessary for the fulfillment of the Agreement concluded between the NL CR and the Registered User, verification of the up-to-dateness of processed personal data and the protection of the library collections. Additional data of the Registered User according to paragraph 3.2. letter B) is verified by the NL CR at the moment when the Registered User requests the provision of a discount or another benefit.

3.9. The controller also collects data about the relationship between him and the Registered User, some of which may have the character of personal data. Service data in relation to the Registered User are data about the registration of the Registered User and about transactions made with the user account, or orders, including the place and time of the transaction and the librarian code. Accounting data are data on financial transactions, especially their purpose, place, time and other requirements given by legislation. Legal data are data related in particular to debt collection.

4. The Processing of Personal Data of the Other User

4.1. Data of the Other User:

- A. name and surname (always mandatory data);
- B. address;
- C. e-mailová address;
- D. type and number of TP, ZTP, ZTP/P card, or indication of a medical impairment or impaired perception of the text;
- E. telephone number;
- F. IP address of the device in the communication network and possibly other data collected automatically, especially as part of so-called cookies.

4.2. Data of the Other User according to paragraph 4.1. are processed by the NL CR to the extent necessary to provide a one-time service according to Article 1, paragraph 1.1., letter b), point i., it is especially mandatory to provide the name and surname of the Other User, if this is required for the particular service. In the event that the Other User requests the provision of the service under special conditions in accordance with the internal regulations of the NL CR or in accordance with Act No. 121/2000 Coll., Copyright Act, as amended (holder of TP, ZTP, ZTP/P card, blind person, person with medical disability that entitles her/him to access special services), the NL CR verifies the submitted documents and processes the data of the Other User in connection with the service provided to the extent specified by the aforementioned regulation. Data of the Other User according to paragraph 4.1. in connection with the provision of services according to Article 1, paragraph 1.1., letter b), point ii., are verified and processed by the NL CR to the extent resulting from the agreement with the license provider or the NL CR's cooperating partners, usually to the same extent as for the Registered User.

4.3. Data of the Other User according to Article 1, paragraph 1.1. letter b), point ii. are verified by the NL CR in the same way as for the Registered User, as stated in Article 3, paragraph 3.8. of this Appendix.

4.4. Furthermore, the controller collects data about the relationship between him and the Other User, some of which may have personal data character as it is by the Registered User.

5. Newsletter

5.1. Any person can also give the NL CR consent to use their e-mail address, name and surname for sending the NL CR newsletter, which mainly contains information about the NL CR events or events for the public that are held on its premises, news and more information related to the work and activities of the NL CR, librarianship and culture.

5.2. Consent can be withdrawn at any time. Each NL CR newsletter sent offers this option. Personal data are processed until consent is revoked.

5.3. To send the newsletter, the NL CR usually uses a supplier who is a processor and the NL CR supervises compliance with all legal regulations in the field of GDPR.

5.4. In connection with sending the newsletter, the following personal data are usually processed and stored in the application:

- A) contact data: name, surname, e-mail address;
- B) data tracked by the application and possibly cookies: web tracking, click rate, open rate, browser type, mailbox type;
- C) information automatically estimated by the application: gender, date of name day.

6. Personal Data Storage

The NL CR stores the personal data:

6.1. On original documents or on their copies, which are mainly:

- A. an agreement, if concluded;
- B. a registration form, which also records changes of the personal data;
- C. written orders of reprographic and information services;
- D. documents provided by the Registered User or Other User, which justify his/her request, if the NL CR keeps them;
- E. accounting and other legal documents;
- F. corresponding electronic documents.

These documents are kept on the official premises of the NL CR, where access of unauthorized persons is prohibited by usual means, and on servers or other technology owned or used by the NL CR. Access to these documents is limited only to employees of the NL CR who work with them as part of their competence and are bound by confidentiality.

6.2. In the database of Registered Users in the library system, where mandatory identification data of the Registered User, additional data of the Registered User, other contact data of the Registered User, work data and login data are stored. The database is stored on a designated server of the NL CR and its management includes standard protection and access control in order to minimize the risk of personal data breach.

6.3. In systems for providing services to Registered Users and Other Users, especially on the basis of contractual-licensing authorizations and cooperation agreements of the NL CR.

6.4. The period for which the personal data of the Registered User or the Other User are stored and an overview of the personal data that appear in the most frequently used documents are given in the table. The period for deletion begins to run in accordance with the file and shredding regulations of the NL CR, usually after the expiration of the Registration, the processing of the order, or from the beginning of the year following the conclusion of the inquiry/order/Registration.

6.5. In the case of the Other user who provided the personal data via a form in the publicly accessible online catalog environment in order to place a request for the delivery of library documents (hereinafter referred to as "**the Pre-registration**"), his/her personal data will either be supplemented in connection with the execution of the Registration, or will be completely deleted without a delay, once the purpose of the Pre-registration is thwarted because the Other User in question did not come to register oneself on-site within the period determined for the Registration, which conditions the provision of the subsequent loan service.

6.6. The following table contains information on the most common documents where the personal data of the Registered User and the Other User are found, on categories of data and deadlines for deletion.

Type of document	Category of data that the given documents may contain	Deadline for deletion/shredding (maximum)
Agreement on the provision of library and information services (including agreements based on	Name and surname, permanent residence address, date of birth, ID of the Registered User, number of national ID	10 years

remote registration), registration form	card/passport/driving licence, contact address, residence permit (number and validity), type and number of TP/ZTP/ZTP/P card, e-mail, telephone number, signature/electronic signature, data box identifier, BankID OID	
Reader card (handed over to the Registered User)	Name and surname, photograph (not stored in the system), academic degree, Registered User's ID, bar code, signature	After returned to the NL CR
Reader account of the Registered User in the library system	Name and surname, academic degree, gender, registered User's ID, bar code, date of birth, permanent residence address, contact address, e-mail, telephone number, number of TP/ZTP/ZTP/P card, may also be the name of the authorized assistant	2 years

Account of the Registered User or Other User in Pre-registration regime	Name, surname, date of birth, permanent residence address, mailing address, e-mail, telephone number	Pre-registration has not been completed – reservation period for library units requested by the Registered User or Other User
Order of reprographic works	Name, surname, permanent residence address/contact address, e-mail, telephone number, signature	2 years
Retrieval Order (online form)	Name, surname, Registered User's ID, ID number of an organization, e-mail, telephone number, address, signature	10 years
E-books on demand	Name, surname, e-mail, telephone number, address, country, salutation, user name, password	2 years
Reported loss of publication	Name, surname, Registered User's ID, signature	10 years and subsequent archiving
Registered User's Research Sheet – Hostivař Reading Room	Name, surname, Registered User's ID, signature	10 years
Statement on copies made by the user	Name, surname, Registered User's ID, signature	10 years
Power of attorney for users with ZTP/P	Name, surname, date of birth, address, number of ZTP/P card, signature	10 years
Registered User's Research Sheet for library units subject to a special protection regime	Name, surname, Registered User's ID, signature	10 years
Protocol on handing over and taking over the Team Study Room	Name, surname, Registered User's ID, signature	2 years
List of materials brought in	Name, surname, Registered User's ID, signature	Shredded no later than the following day, if not collected by the Registered User
Registration card for loan processing	Name, surname, Registered User's ID	Shredded on the day following the loan collection/ upon expiration of the reservation period
Loan Confirmation	Name, surname, contact address, registered User's ID, signature	2 years
E-mail communication	Name, surname, Registered User's ID, e-mail, telephone number	2 years
Ask Your Library - questions	Name, surname, e-mail	2 years
Ask Your Library – chat and cookies - ZOHO SalesIQ processor	IP address, location, number identifier	2 years
Records of performance provided by the Registered User / Other User	Name, surname, e-mail, phone, address	10 years
Data on financial deposit and drawing from it	Name, surname	10 years
Invoice for course/exam	Name, surname, address	10 years
Orders via Retrls	Name, surname, e-mail, telephone number, year of birth, user's ID	90 days

7. The Processing of Personal Data in Connection with Making Available the NL CR Website and the Content of the NL CR Electronic Information Resources via Remote Access (Online)

In connection with making available the content of the website that the NL CR operates and the mediation of electronic information resources via remote access (online) to the Registered Users in accordance with

Article 1, the NL CR processes the personal data in the form of so-called cookies. In general, the types of cookies are as follows:

- i. functional cookies that are necessary for the operation of the given service;
- ii. analytical cookies, which can be used to improve the functioning of the website;
- iii. marketing cookies that enable monitoring of a specific person's preferences and targeting of services or advertising.

Some cookies may collect personal data of the website visitor. For this reason, analytical and marketing cookies can be rejected, or your decision to accept them can be revoked at any time. Due to the extensive range of services offered and mediated by the NL CR in the online environment, specific information on the distribution, purpose, controller and storage period of personal data is provided on the website in question, which the data subject views.

8. The Obligations of the NL CR Employees when Processing Personal Data of Registered Users

All employees of the NL CR are obliged to process personal data of all categories of the Registered Users, Other Users and any other persons exclusively within the scope of the agreed type of work and the description of their work activities and tasks set to them by their senior employees, within the scope and purpose stated above and in accordance with the provisions of the Regulation and the Act on the processing of PD, the relevant internal guidelines of the NL CR and other binding regulations. Employees of the NL CR are obliged to maintain the confidentiality of personal data that they have become familiar within the course of their work or in connection with it.

9. The Disposal of Personal Data

9.1. The NL CR processes personal data of the Registered User and Other User from the moment they take steps to conclude an Agreement with the NL CR or request the services offered.

9.2. Personal data of the Registered User and Other User are kept by the NL CR until there is a reason for their deletion (usually a request from the data subject) or termination of personal data processing.

9.3. If the Registered User or Other User request in writing to terminate the processing of their personal data, and if the Registered User or Other User have no ongoing obligations towards the NL CR and if the NL CR is not prevented from doing so by obligations arising from legal regulations or ongoing contractual obligations, the NL CR considers the contractual relationship or provision of the service for terminated and the personal data are disposed of without undue delay as follows:

- A. by shredding original documents according to the provisions of the NL CR Data Shredding Regulations and in accordance with applicable legislation;
- B. by deleting the data in the database of Registered Users and in other systems or by irreversibly anonymizing them, these anonymized data are used only for statistical purposes;
- C. by deleting data on Other Users in the service provision systems as per Article 1, paragraph 1.1., letter b) according to the provisions of the NL CR Data Shredding Regulations;
- D. by deleting communication with the Registered Users, Other Users and users according to Article 1, paragraph 1.1., letter B), point i. in means of communication.

If any of the conditions stipulated in the previous paragraph 9.3. above are not met, or if there are legal reasons for keeping personal data, the NL CR informs in writing about the reasons for which it cannot, or is not entitled to comply with the request of the Registered User or Other User.

10. The Data Subject Rights and Their Assertion

10.1. The Registered User or Other User as the personal data subjects have the following rights:

- i. Right of access by the data subject (Article 15 of the Regulation)
The data subject has the right to obtain the confirmation from the controller as to whether, and if so, how his/her personal data are being processed, and more detailed information about their processing.
- ii. Right to rectification or erasure (Articles 16 and 17 of the Regulation)
The data subject has the right to correct or supplement incomplete or inaccurate personal data as well as to delete personal data, if the conditions set out in the aforementioned Regulation are met.
- iii. Right to restriction of processing
The data subject has the right to restrict the processing of his/her personal data, if the conditions set out in the Regulation are met.
- iv. Right to data portability (Article 20 of the Regulation)
When processing personal data on the basis of consent or contract, the data subject has the right to transfer his/her personal data to another controller, if this is technically feasible.
- v. Right to object (Article 21 of the Regulation)
In the event that personal data are processed to fulfill a task in the public interest, for the purposes of the controller's legitimate interests or as part of direct marketing, the data subject has the right to object to the processing of personal data in accordance with the GDPR Regulation.
- vi. Right to withdraw the consent to the processing of personal data (Article 7 of the Regulation)
If the data subject's personal data is processed on the basis of consent, the data subject has the right to withdraw consent to the processing of personal data. The withdrawal of consent does not affect the legality of personal data processing prior to the withdrawal of consent.

10.2. If the Registered User or Other User does not insist on submitting an official request and its written processing, it is possible to exercise the right to correct or supplement his/her personal data in the Main Hall or other NL CR departments, which are authorized to correct or update inaccurate or out-of-date personal data in the course of their usual activities in direct contact with the Registered User or Other User.

10.3. To exercise the data subject's rights with the controller, the competent department is the Office of the General Director. The rights can be exercised:

- i. by e-mail: gdpr@nkp.cz
- ii. by data box: 5qt8sy8
- iii. in writing at the address: National Library of the Czech Republic, Office of the General Director, Mariánské náměstí 190/5, 110 00 Prague 1, Czech Republic

In order to speed up the processing of the request, it is recommended to indicate the subject of the message "GDPR - exercise of rights." If necessary, the controller may request the provision of additional information necessary to confirm the identity of the data subject. To submit an application, it is possible to use the form on the NL CR website at www.nkp.cz.

10.4. The Registered User or Other User has the right to address their complaint directly to the supervisory authority that is:

Úřad pro ochranu osobních údajů (Office for Personal Data Protection)
Address: pplk. Sochora 727/27, 170 00 Prague 7 – Holešovice, Czech Republic
Telephone number: +420 234 665 111
e-mail: posta@uouu.cz