
Directive S2025-03

1 April 2025

Processing of Personal Data Pursuant to Act No. 110/2019 Coll., on the Processing of Personal Data

1. General information about the personal data controller

The personal data controller is the Institute of Organic Chemistry and Biochemistry of the Czech Academy of Sciences (hereafter "IOCB"), with registered place of business at Flemingovo nám. 542/2, Prague 6 – Dejvice, Company ID No. 61388963, entered in the register of public research institutions administered by the Ministry of Education, Youth, and Sports of the Czech Republic.

2. Scope and reason for processing personal data

The legal basis for processing personal data is Act No. 110/2019 Coll., on the Processing of Personal Data, as amended, 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, hereafter "GDPR"), as well as Act No. 262/2006 Coll., the Labour Code, as amended.

IOCB processes personal data essential to the fulfilment of its primary purpose, which is scientific research in the fields of organic chemistry, biochemistry, molecular and cellular biology, computational chemistry, physical organic chemistry, and biochemistry, as well as in related fields such as medicinal chemistry, bioorganic chemistry, bioinorganic chemistry, and molecular pharmacology. This includes the execution of scientific research projects both independently and in collaboration with universities and other scientific and specialized institutions and also extends to educational activities. The data processing arises from the following requirements:

- i) legal requirements;
- ii) requirements of contractual partners, co-investigators of scientific research projects, grant providers, government authorities, and other contractual partners.

Employee personal data are processed by the respective departments of IOCB in accordance with IOCB file and retention rules and other regulations. The scope of processing complies with legal and contractual requirements and is subject to regular internal control.

3. Information on the basic rights of data subjects

Data subjects typically include the following persons: employees, job applicants; interns and students; participants and teachers of courses organized or co-organized by IOCB; speakers or attendees of conferences and scientific meetings organized or co-organized by IOCB; individuals utilizing IOCB infrastructure and services (e.g. users of laboratory equipment, etc.); visitors; employees of companies providing equipment servicing, building maintenance, and similar services; users of the IOCB gym; users of the IOCB dining facility; individuals performing contractual work, etc.

Each data subject has the right to information (Article 15 GDPR), rectification (Article 16 GDPR), erasure (Article 17 GDPR), restriction of processing (Article 18 GDPR), and data portability (Article 20 GDPR).

If a data subject has given consent to the processing of their personal data, they have the right to withdraw their consent at any time. The legality of processing prior to withdrawal remains unaffected. Further processing of these data based on another legal basis, such as fulfilling legal or contractual obligations, remains unaffected, taking into account the period required to meet such obligations.

The right to object and withdraw consent

Each data subject has the right to object, at any time, on grounds relating to their particular situation, to the processing of their personal data under Article 6(1)(e) GDPR (processing in the public interest) or Article 6(1)(f) GDPR (processing based on legitimate interest). If an objection is raised, IOCB will process the personal data only if it demonstrates compelling legitimate grounds that override the interests, rights, and freedoms of the data subject or if the processing is necessary for the establishment, exercise, or defence of legal claims.

The right to erasure and the right to be forgotten

This applies automatically where personal data are no longer necessary for the purpose for which they were processed or for another compatible purpose, or if the data subject withdraws their consent. If the controller does not delete the data automatically, the data subject may request their erasure. However, the right to erasure cannot be exercised where the data must be retained due to legal or contractual obligations undertaken by IOCB, or where necessary for public health protection, archiving, or the establishment, exercise, or defence of legal claims.

The right to rectification or updating of data

The right to rectification or updating applies automatically, but it can also be exercised upon request if the controller does not update the data on its own initiative. The controller must rectify inaccurate personal data without undue delay. The data subject also has the right to complete incomplete data, including by providing an additional statement.

The right to obtain confirmation of data processing

Every data subject has the right to obtain confirmation from the controller regarding whether their personal data are being processed and to what extent. This right can be exercised by submitting a request to IOCB.

Camera systems

IOCB automatically processes records from security cameras located on its premises.

IOCB operates a camera system with online transmission and recording. Cameras are placed in shared hallways and outdoor areas of IOCB for operational and security reasons and to investigate any unlawful activities. The legal basis for processing personal data includes both legal and contractual obligations regarding IOCB property management.

Processing and transfer of personal data to third parties

IOCB processes personal data primarily for the purpose of fulfilling its research activities and entering into and fulfilling contractual obligations, including grant, purchase, and framework agreements. Based on these legal grounds, IOCB processes data such as name, surname, academic titles, bank account number, photograph, internal personal identification number,

telephone number, birth number, date and place of birth, passport number (if applicable), email address, permanent residence address, mailing address (if different), and payroll-related data. IOCB processes these data only to the extent necessary for fulfilling its obligations.

Exercising rights and legal claims, government oversight

IOCB also processes personal data for the purpose of asserting its rights and legal claims, as well as for government audits and other similarly significant reasons. The transfer of personal data to third parties occurs solely to fulfil legal or contractual obligations necessary for the effective performance of IOCB's activities (basic research).

Data retention period

IOCB processes personal data in compliance with applicable legal regulations. The retention period varies for each type of personal data depending on its nature, legal obligations (e.g. document archiving), and the time required to fulfil contractual obligations (including employment-related obligations). It also considers grant agreements related to the acquisition and further use of IOCB infrastructure.

Personal data are processed only for the necessary duration in accordance with IOCB's legal obligations and legitimate interests.

The data retention period for a given purpose is communicated to the data subject at the start of processing and can be provided again upon request.

Personal data collected in connection with recruitment are processed for the duration of the recruitment process. After the recruitment process concludes, data are retained only with the consent of the data subject for future job opportunities.



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