

PRINCIPLES OF PERSONAL DATA PROCESSING

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1. What will you find in this document?

Inside this document, you will find information concerning the processing of personal data as part of administration of roads, especially paid parking zones, carried out about you (hereinafter "**You**") as a data subject by the City of Prague (Prague City Hall), of registered office Praha 1, Staré Město, Mariánské náměstí 2/2, post code: 110 00, in the position of personal data controller (hereinafter the "**City**").

You are a **data subject** in the following cases:

- a) You are applying for a permit to use paid parking zones (a parking permit, parking session) as a natural person, a natural person conducting business, or as a representative of a legal person, or You or the legal person You represent already hold such a permit
- b) You are the owner or operator of a vehicle for which a parking permit has been issued, if the holder of the parking permit is not the direct owner or operator of the vehicle
- c) as the user (driver) of a vehicle, You are parking on a road managed by the City, especially in a paid parking zone, or the vehicle of which You are the owner or operator is parking on a road managed by the City, especially in a paid parking zone, as part of the collection of information on roads on the part of the City for the purposes of assessing their condition, occupancy and use
- d) You are posing a question on the functioning of paid parking zones (via online form, email or by telephone)
- e) You are requesting compensation for costs incurred due to a error in the paid parking zone system (a refund)

Due to your status as a data subject, You have the right to consult the issue of protection of your personal data with the Data Protection Officer, whom You can contact at the email address poverenecgdpr@praha.eu, or at the address Mariánské nám. 2, Praha 1. In-person consultation is only possible by prior arrangement.

In these principles You will learn the purposes for which the City is processing your personal data, the scope of this processing (i.e. what categories of data are processed), on what legal basis the City is processing your data (performance of a contract, legitimate interest, fulfilment of a legal obligation, consent, other grounds) and for what period it is entitled to process your data.

These principles furthermore contain information on what rights You have in relation to the processing of your personal data and how they can be brought to bear against the City.

2. What personal data about You does the City process, for what purpose, for how long, and on what grounds?

The City processes various categories of personal data about You for various purposes. These are the specific categories in question:

Data category	Demonstrative list of personal data (for example)
Identification data	name, surname, Company Reg. No., VAT No., birth date, ID number, passport number
Information on education (only as a title listed by your name)	academic titles
Contact information	email address, telephone number, data mailbox ID
Address information	permanent residence address, mailing address, address of business registered office, branch address, address of property owned by You
Vehicle identification data	state registration plate, or registration plate
Data on owner or operator of vehicle	Identification data (name, surname), address data (permanent residence address)
Data demonstrating the applicant's relationship to the vehicle	data from the technical certificate, in particular on who is the operator of the vehicle; data from the leasing contract, contract with employer or represented legal person
Data demonstrating the facts necessary for obtaining a parking permit or parking session	Information from the identification document, travel document or permanent residence permit for foreigners, extract from the land register
Data necessary for exercising of payments and accounting of payments	bank account number, bank code, IBAN, SWIFT, payment card number/CCS, expiry date of payment card/CCS, number of issued payment document
Log-in data	email address, password and code to the extent necessary for the technical operation of the personal page

Your device's identification information	IP address, data on device location, telephone number
Information on your state of health (only in the case of parking permits for caretakers)	data contained on the ZTP/P card, data from a medical report on one's inability to take care of oneself
Parking permit data	the existence/non-existence of a parking permit, parking permit number, category of parking permit, parking area, price of parking permit, expiry date
Parking session data	validity of parking session, data on position of parking machine, identification of parking zone section, ID of parking session
Information forming the content of a message	Any information forming the content of your message, in particular a description of the situation and problem
Vehicle photo record	photograph of the vehicle
Record of road situation	incidental photographs of vehicles and persons
Data on place and time of vehicle parking	date, time and location of vehicle

What specific personal data about You the City processes, for what purpose and how long always depends on how and why you have shared your personal data with the City, or how the City obtained it. Below you can find information on the processing of your personal data based on the context in which the personal data processing takes place:

2.1. Parking permits for residents, subscribers and property owners

You have the option of applying for a parking permit for residents, subscribers or property owners for individual municipal districts of the City and providing the data required to demonstrate the conditions for obtaining a parking permit have been met. In such a case, the City processes your personal data to the extent, for the purpose, for the period and on the grounds (legal basis) listed below:

Purpose	Scope of information processed	Legal basis	Duration of processing
Processing, administering and keeping records of parking permit, incl. information and service communication	<ul style="list-style-type: none"> – Identification data – Information on education – Contact information – Address information – Vehicle identification data – Data demonstrating the facts necessary for obtaining a parking permit – Data demonstrating the applicant's relationship to the vehicle – Data necessary for exercising of payments and accounting of payments – Parking permit data 	Necessary for fulfilling task carried out in exercise of public authority with which the controller is entrusted on the basis of Section 23 of Act No. 13/1997 Coll., on Roads	<p>Data kept for the duration of the parking permit validity and for 12 months after the parking permit has expired</p> <hr/> <p>If a parking permit is not issued, data is kept for 1 month from when it is not issued (application is rejected)</p>
Processing, administering and keeping records of parking permit for caregivers, incl. information and service communication	<p>(in addition to personal data in the previous row)</p> <ul style="list-style-type: none"> – Information on your state of health (e.g. information on ZTP/P card) 	Processing necessary due to significant public interest, which is the interest in supporting the mobility of persons with limited mobility	<p>Data kept for the duration of the parking permit validity and for 12 months after the parking permit has expired</p> <hr/> <p>If a parking permit is not issued, data is kept for 1 month from when it is not issued (application is rejected)</p>

If You decide to apply for a parking permit, the City needs the personal data listed above to process your request and issue You a parking permit. Without the above personal data, the City cannot process and administer a parking permit for You.

In addition to this, the data provided is required for the City to be able to communicate with You in the case of important information that directly relates to the processing and administration of the parking permit, information concerning the city's activities to benefit citizens in this area, as well as about the improvement of the parking system, etc.

2.2. Registration and maintenance of user account in the Client Zone (CZ) and logging in to the Portál Pražana account

Through an application for the client zone you can register for the client zone (user account) at <https://portal.zpspraha.cz/>. As part of your user account, the City allows you to manage your parking permit.

You can also view your user account in the CZ via the application Portál Pražana, run by the City at <https://www.portalprazana.cz/>. Access to data in the CZ via this portal is fully secured by verifying your identity and serves to increase the convenience of accessing information on your current parking permits.

In this case, the City processes your personal data to the extent, for the purpose, for the period and on the grounds (legal basis) listed here:

Purpose	Scope of information processed	Legal basis	Duration of processing
Carrying out the applicant's registration, running and managing the client zone, including information and service communication	<ul style="list-style-type: none"> – Identification data – Information on education – Contact information – Log-in data 	Necessary for fulfilling task carried out in exercise of public authority with which the controller is entrusted on the basis of Section 23 of Act No. 13/1997 Coll., on Roads	Data kept for the duration of the validity of parking permits and for 12 months after the last parking permit has expired. If the user cancels registration of the user account, the data is deleted.

The provision of this personal data for the purpose of registering the applicant, running and managing the user's personal page, including communication on your part, is entirely voluntary, but without it the City is not able to set up and run a user personal page for You.

In addition to this, the data You provide is required for the City to be able to communicate with you in the case of important information directly or indirectly concerning the processing of your parking permit, etc.

2.3. Parking session

If You are a visitor and only need to park within the City for a limited time, You can make use of a parking session, i.e. a short-term authorisation to use paid parking zones, which can be obtained through a parking machine or virtual parking meter. In such a case, the City processes your personal data to the extent, for the purpose, for the period and on the grounds (legal basis) listed here:

Purpose	Scope of information processed	Legal basis	Duration of processing
Processing, administering and keeping records of short-term parking authorisation, incl. information and service communication	<ul style="list-style-type: none"> – Vehicle identification data – Parking session data – Data necessary for exercising of payments and accounting of payments 	Necessary for fulfilling task carried out in exercise of public authority with which the controller is entrusted on the basis of Section 23 of Act No. 13/1997 Coll., on Roads	Data kept for period of 3 years from entry in the central information system of City of Prague paid parking zones
Processing, administering and keeping records of short-term parking authorisation via a virtual parking meter, incl. information and service communication	<ul style="list-style-type: none"> – Contact information – Device identification information – Vehicle identification data – Parking session data – Data necessary for exercising of payments and accounting of payments 	Necessary for fulfilling task carried out in exercise of public authority with which the controller is entrusted on the basis of Section 23 of Act No. 13/1997 Coll., on Roads	Data kept for period of 3 years from entry in the central information system of City of Prague paid parking zones

Provision of this personal data for the purpose of a short-term parking authorisation and the administration and record-keeping thereof, including related communication, is entirely voluntary on your part, but without the provision thereof, the City is not able to process your parking permit.

The City may use the data provided to communicate with You in relation with the short-term parking authorisation (e.g. when it expires).

2.4. Monitoring of traffic signs, road conditions and parking space occupancy

In accordance with Section 9 (3) of Act No. 13/1997 Coll., on Roads, the City is obliged to manage the roads within the City of Prague. As part of this management, it monitors the occupancy of parking spots, the technical condition of the roads and the state of traffic signage.

Although it is not the primary purpose of this activity, during monitoring it is possible that vehicles, including registration plates, and potentially bystanders are captured by photographs. For this reason, the City informs You of the following processing:

Purpose	Scope of information processed	Legal basis	Duration of processing
Ongoing monitoring and evaluation of the occupancy of parking spots on roads within the City of Prague for the purpose of transport organisation	<ul style="list-style-type: none"> – Vehicle identification data – Data on place and time of vehicle parking – Parking permit data 	Necessary for fulfilling task carried out in exercise of public authority with which the controller is entrusted on the basis of Section 23 of Act No. 13/1997 Coll., on Roads	Data kept for 4 months from record being made
Checking of traffic signs and technical condition of roads as part of management and maintenance of roads within the City of Prague	<ul style="list-style-type: none"> – Photo record of vehicle, incl. data on time and place taken – Exceptionally/ incidentally taken records (photographs) of bystanders 	Necessary for fulfilling task carried out in exercise of public authority with which the controller is entrusted on the basis of Section 23 of Act No. 13/1997 Coll., on Roads	Data kept for 24 months from record being made

The collection of personal data as part of this activity is incidental. In terms of further use, the City works with statistical and aggregated data (without personal data).

2.5. Ongoing monitoring of parking permit validity

In order to check whether vehicles parking on roads managed by the City are there rightfully, in particular with a valid parking permit, monitoring systems using hand scanners or scanners affixed to monitoring vehicles are used. The City minds the use of roads in its territory in accordance with the legal regulations and endeavours to prevent the misuse thereof. For this purpose, the following processing takes place:

Purpose	Scope of information processed	Legal basis	Duration of processing
Ongoing monitoring of validity of parking permits and authorisation to park in paid parking zones via a camera system, incl. assessment of material acquired	<ul style="list-style-type: none"> – Photo record of vehicle – Vehicle identification data – Data on place and time of vehicle parking – Exceptionally/ incidentally taken records (photographs) of bystanders – Parking permit data 	Necessary for fulfilling task carried out in exercise of public authority with which the controller is entrusted on the basis of Section 23 of Act No. 13/1997 Coll., on Roads	<p>Data for which there is no suspicion of a breach of paid parking zone regulations is kept for a period of 7 days from being entered into the central information system for City of Prague parking zones</p> <p>Data for which there is a suspicion of a breach of paid parking zone regulations is handed over to the City of Prague Police; if the City of Prague Police labels the data as no offence detected, it is deleted once a day</p>

2.6. Contacting the City

Through the contacts listed at [http:// parking.praha.eu/cs/kontakt/](http://parking.praha.eu/cs/kontakt/)

You have the option of contacting the City and asking for an answer to your questions, in particular as regards paid parking zones. In such a case, the City processes your personal data to the extent, for the purpose, and on the grounds (legal basis) listed here:

Purpose	Scope of information processed	Legal basis	Duration of processing
Answering question	<ul style="list-style-type: none"> – Contact information – Information forming the content of the message 	Legitimate interest in answering the question	Data is stored for 2 years from the question being answered, or for 2 years from the last communication between You and the City as part of the relevant query

Provision of this personal data on your part is entirely voluntary, but without it the City is not able to answer your question. You have the right to object to the processing of personal data for these purposes through the procedure specified in sub-section 4.6.

2.7. Refund in the case of a system error

If an error takes place on the part of the paid parking system and you contact the City with a request for reimbursement of costs (refund), the City will process your personal data to the extent, for the purpose and on the grounds (legal basis) listed here:

Purpose	Scope of information processed	Legal basis	Duration of processing
Assessing the legitimacy and processing the request for reimbursement of costs (refund) incurred by an error in the paid parking zone system	<ul style="list-style-type: none"> – Identification data – Contact information – Information forming the content of the message – Data necessary for exercising of payments and accounting of payments 	Necessary for fulfilling the legal obligation to reimburse damages and, as appropriate, to pay out unjust enrichment	<p>If the request is found to be justified and a refund is made, the data is stored for the period of obligation to keep accounting documents.</p> <p>If the request is found to be unjustified and is rejected, the data is stored until the statute of limitations for the claim in question is reached.</p>

The provision of this personal data on your part is entirely voluntary, but without it the City is not able to assess and process your request.

3. To whom does the City disclose your personal data?

It is not certain in advance to whom the City will provide your personal data. For this reason, we provide here the categories of possible recipients with the justification of why your personal data could be transferred:

Recipient	Reason for disclosure
Persons involved in running the paid parking zones, e.g. ensuring operation of the website, software (computer systems)	The City has concluded a contract with the Technical Administration of Roads, which as a personal data processor provides for the operation of the system of paid parking zones, charging of the prices for parking permits or parking sessions, the functioning of the paid parking zone information system, incl. service and information communication, and furthermore collects field data under the system.
Payment broker	If You do not pay directly by cash, your personal data is processed by the payment broker. Also, if the City sends You money by cashless transaction, it must use a payment service provider for this. The City may need to share your personal data to the extent necessary to this end.
Legal advisors	The need can sometimes arise for the City to let legal advisors view the information on legal relations with You. These are persons who are bound by a legal obligation of confidentiality.
City of Prague Police	In the case of a suspected offence, communication with the City of Prague Police takes place, which requires certain personal data as evidence.
Other persons – experts involved in road management	As part of the administration of roads and care therefor, the City must occasionally make use of the services of other persons – experts. As part of this, the need can arise to provide them with material the City has about roads. For example, designers can be provided with photo documentation of roads. As part of this, no further use of your personal data takes place however. Personal data is only present incidentally in this case.

If you need information about to whom and for what purpose your personal data has been shared, the City is happy to comply.

4. What are your rights?

The City would like to inform You about the rights to which You are entitled in connection with the City processing your personal data. You can bring all your rights to bear with the City in any way that suits you and which allows the City to verify that it is truly You asking (to verify your identity), and the City will endeavour to accommodate You as much as possible. In order to meet your needs as best as possible, we ask that You bring your rights to bear in writing to the address Mariánské náměstí 2/2, Praha 1, 110 01, or the email address zps@tsk-praha.cz.

4.1. Right to access

You have the right to access the personal data the City processes about You, and at the same time the right to information on what personal data about You is being processed, for how long, for what purposes, to whom it is divulged and whether it is used for automated decision-making (and potentially how this automated decision-making works).

The City shall provide You with a copy of your personal data free of charge. Only in the case of multiple copies will it request the necessary payment for provision thereof.

4.2. Right to rectification

If You determine that the City is processing incomplete or incorrect personal data, You have the right to have the City correct or, if it is necessary for the purpose of the processing, supplement the personal data.

4.3. Right to erasure

It is also your right to have the personal data the City is storing and processing about your person erased. In order to request erasure, one of the following reasons must be met:

- your personal data is no longer needed for the purpose for which it was collected or processed
- the City is processing your personal data illegally
- You object to the processing of the personal data the City is processing on the basis of public interest and the City is unable to prove that the public interest outweighs your right to erasure
- You object to the processing of the personal data the City is processing on the basis of legitimate interest and the City is not able to prove that the legitimate interest outweighs your right to erasure
- there is legal grounds that require the erasure of this personal data

The City would like to inform You that a situation can arise whereby your personal data cannot be erased on the basis of your request for erasure. Such a case is, in particular, the situation where the processing of your personal data is required by law. Should such a situation arise, the City will inform you of the grounds on which it cannot erase your personal data.

4.4. Right to restrict processing

In cases where You feel that your personal data processed by the City is incorrect, You have the right to request that the City restrict the processing of your personal data to the time absolutely necessary to verify the accuracy of your personal data and potential correction thereof.

You also have this right in the following cases:

- the processing of your personal data by the City is illegal, but You do not want your personal data to be erased
- the City no longer needs your personal data for the purpose for which it was processing it, but You insist on it being processed (retained) by the City for the identification, exercising or defence of your legal claims
- You have objected to the processing of your personal data on the basis of the City's public interest and the restricted processing is valid for the time necessary to determine whether the public interest outweighs your right for your personal data to no longer be processed
- You have objected to the processing of your personal data on the basis of the City's legitimate interest and the restricted processing is valid for the time necessary to determine whether the City's legitimate interest outweighs your right for your personal data to no longer be processed

4.5. Right to object to the processing of your personal data processed for the performance of a task carried out for reasons of public interest

In light of the fact that the City processes some of your personal data for performance of a task carried out in the public interest, you have the right to object to such processing, on the basis of which the City shall assess whether it is truly necessary for your personal data to be processed in order to perform this task in the public interest or whether your right for your personal data to no longer be processed outweighs it.

4.6. Right to object to processing of your personal data on the basis of legitimate interest

In light of the fact that the City processes some of your personal data on the basis of legitimate interest, you have the right to object to such processing, on the basis of which the City shall assess whether it is truly necessary for your personal data to be processed for the given purpose or whether your right for your personal data to no longer be processed outweighs it.

4.7. Right to lodge a complaint

In the event that all the rights above are, in your view, insufficient, or You are of the opinion that the City is violating your rights in any way, You have the right to lodge a complaint with the supervisory authority. You can lodge a complaint by contacting the Office for Personal Data Protection, which is available at the website <https://www.uoou.cz/podatelna-uradu/os-1006>.

5. Validity and effect

These Principles are valid and effective as of 25 May 2018.

These Principles were last updated 1 March 2023