

## **Personal Data Protection**

On this page you will learn everything about the personal data processing that we perform, including details about your rights and how to claim them, if we process your personal data. You can find more detailed information about individual types of processing, your rights and how to claim them under the links—names of individual types of personal data processing.

- I. [Customers, Suppliers and Their Representatives](#)
- II. [Job Seekers](#)
- III. [Employees](#)
- IV. [Clients \(Patients\), Their Representatives and Close Persons](#)
- V. [Marketing](#)
- VI. [Video surveillance system](#)
- VII. [Phone call records](#)

- I. Customers, Suppliers and/or Their Representatives** – the saving of contact data because of negotiations on a contractual relationship, the conclusion of a contractual relationship and data necessary for the implementation of contractual relationships and the performance of statutory duties (accounts, taxes, etc.). Processing of data for the purpose of the controller's legitimate interests. Saving of contact data (if any) of suppliers' and customers' representatives (employees, statutory representatives or other designated persons).

Comprehensive information about processing, including detailed information about your rights and about the conditions for claiming them, as well as about the manner in which the rights can be claimed, is available [HERE](#).

- II. Job Seekers** – in connection with the selection of job seekers for positions advertised, the company needs to gather and, at least for the selection period, process job seekers' identification and contact data, as well as data about their education, qualifications and previous experience.

If a job seeker expresses an interest, in the event he/she is not selected or at a moment the company was not looking for labour, in being included on the list of potential employees that will be approached with suitable job offers, he/she hereby grants his/her consent to personal data processing and the sending of job offers to his/her e-mail address. The company will process a job seeker's personal data for two years after the granting of consent. A job seeker's identification and contact data will be processed, as well as data about his/her previous experience, completed education and qualifications.

Consent to processing in the meaning of the previous paragraph may be withdrawn at any time. Erasure from the list of job seekers will be a consequence of withdrawal of such consent. In the future, such person will not be sent job offers at the company.

Comprehensive information about processing by the company, including detailed information about your rights and about the conditions for claiming them, as well as about the manner in which the rights can be claimed, is available [HERE](#).

- III. Employees** – processing of employees' personal data for the implementation of basic labour and legal relationship, for compliance with the employer's legal obligations (fulfilment of employment obligation) and for claiming and protecting an employer's rights and legal interests.

Comprehensive information about processing, including detailed information about your rights and about the conditions for claiming them, as well as about the manner in which the rights can be claimed, is available [HERE](#).

- IV. Clients (Patients), Their Representatives and Close Persons** – the processing of personal data of a client (patient) for the purpose of providing healthcare services and healthcare to a client (patient) and for compliance with the company's statutory duties.

For the processing of personal data in connection with healthcare the Controller has appointed a personal data protection officer according to the General Data Protection Regulation. The personal data protection officer can be contacted via e-mail: [gdpr@myclinic.cz](mailto:gdpr@myclinic.cz).

Comprehensive information about processing, including detailed information about your rights and about the conditions for claiming them, as well as about the manner in which the rights can be claimed, is available [HERE](#).

- V. Marketing** – gathering and processing data for the purpose of determining the best offer of services to clients (patients) and potential clients (patients).

Comprehensive information about processing, including detailed information about your rights and about the conditions for claiming them, as well as about the manner in which the rights can be claimed, is available [HERE](#).

**VI. Video surveillance system** – gathering and processing data for the purpose of protection of individual's life and health and property protection purposes.

Comprehensive information about processing, including detailed information about your rights and about the conditions for claiming them, as well as about the manner in which the rights can be claimed, is available [HERE](#).

**VII. Phone calls records** – gathering and processing data for the purpose of improving provided services.

Comprehensive information about processing, including detailed information about your rights and about the conditions for claiming them, as well as about the manner in which the rights can be claimed, is available [HERE](#).

## I. CUSTOMERS, SUPPLIERS AND THEIR REPRESENTATIVES

### 1. CONTROLLER

The personal data controller is **MyClinic s.r.o.**, having its registered office at: Generála Píky 430/26, 160 00 Prague 6 - Dejvice, company ID number: 01490575, entered in the Commercial Register kept at the Municipal Court in Prague, File Ref. C 207465 (hereinafter the “**Controller**”).

### 2. YOUR RIGHTS

In relation to the relevant processing, you have the following rights:

- a. **ACCESS** – the right to information about whether your personal data are processed or not. If personal data are processed, also the right to information about processing to the prescribed extent and a right, under certain conditions, to obtain a copy of the data processed;
- b. **RECTIFICATION** – the right to request rectification, if personal data processed are inaccurate. Or the right to request supplementation, if data are not complete;
- c. **ERASURE** (“right to be forgotten”) – the right to request, under the conditions stipulated by legal regulations (withdrawal of consent, end of contract, unlawfulness of processing) the erasure of data;
- d. **RESTRICTION OF PROCESSING** – the right to request a designation and possible restriction (suspension) of processing until verification of the accuracy of data, the lawfulness of processing, dealing with an objection or because of the protection of your interests (claiming, protection or defence of rights and legal interests);
- e. **COMPLAINT** – the right to contact the Office for Personal Data Protection with a complaint about the Controller, processing or the conditions for claiming rights. For contact and other details about the Office see [www.uoou.cz](http://www.uoou.cz).

You also have a right to:

- **OBJECT** – the right to request that your personal data are not further processed because of legitimate interests of the Controller or for marketing purposes.

Regarding the individual rights, their detailed characteristics, the conditions for their arising and claiming and the procedure for claiming them see [HERE](#).

The Controller **has not** appointed for the processing of personal data regarding suppliers and customers of goods and services a **PERSONAL DATA PROTECTION OFFICER**.

### 3. PURPOSE OF PROCESSING

The Controller processes personal data for the purpose of performing a contract and because of its legitimate interests: records of the identification and contact details of potential customers and suppliers of goods and services for the purpose of negotiating a contract, records of communications concerning negotiations on a contract (in order to prove the content of a contract or in connection with pre-contractual liability, etc.), conclusion and performance of a contract. In connection with the performance of a contract it concerns documentation and correspondence concerning the fulfilment of a contractual obligation for the purpose of proving the method of performing a contract, protection and claiming of rights and performance of the Controller’s statutory duties (tax records, etc.).

If a customer or supplier is not a contracting party itself, data of its employees, statutory representatives or other persons designated for negotiations on a contract, the conclusion of a contract or ensuring performance of a contract are recorded.

### 4. LEGAL BASIS FOR PROCESSING

The legal basis for processing personal data are:

- If a supplier or customer is a natural person, in relation to records of potential suppliers and records of customers the Controller’s legitimate interest (Art. 6(1)(f) of the General Data Protection Regulation), at the stage of conclusion and performance of a contract—measures necessary before the conclusion of a contract and performance of a contract with a data subject (Art. 6(1)(b) of the General Data Protection Regulation).
- If a supplier or customer is a legal entity, in relation to records of suppliers and customers,

negotiation and performance of a contract where the subject of processing are personal data about representatives of the supplier or customer, the legal grounds is the Controller's legitimate interest (Art. 6(1)(f) of the General Data Protection Regulation. The same applies in relation to a natural person doing business, if it uses its employees or other representatives.

#### **5. EXTENT OF DATA that is processed**

The Controller processes the following personal data for the aforementioned purpose:

- If the supplier or customer is a natural person—identification and contact data, i.e. first name, surname, academic titles, principal business activities, place of business and data concerning the contractual relationship, including related communications concerning negotiations on a contract and performance of a contract;
- If a supplier or customer is a legal entity—identification and contact data of a representative of such entity (contact data about the place of employment), job, communications related to negotiations on contract with employer and fulfilment of contract with employer. The same applies in relation to a natural person doing business, if it uses its employees or other representatives.

#### **6. PROVISION OF DATA IS NECESSARY.**

The provision of personal data, if it is in connection with the conclusion of a contract and its performance, is necessary. Without the data it is not possible to conclude a contract and subsequently perform it.

#### **7. PERIOD for which personal data are stored and processed**

The Controller processes personal data: contractual documents necessary for performance of obligation relationship for the period of performance of a contract and also until the shredding time derived from the public-law obligation concerning taxes (10 years). Other records and communications are stored until the usual shredding time derived from the length of time-bar periods. If an entity is not traded with for a long time and if further trading is improbable, it is removed from records.

#### **8. SOURCE OF PERSONAL DATA**

The Controller obtains personal data directly from data subjects, their employers or persons with whom a data subject maintains a relationship or from public registers.

#### **9. RECIPIENTS and other entities to whom personal data can be provided**

Personal data will be provided to the following recipients (categories of recipients): state bodies and other entities as a part of the performance of duties stipulated by legal regulations (e.g. tax administrators, courts, bailiffs, authorities active in criminal proceedings).

#### **10. THIRD COUNTRIES**

The personal data are NOT handed over outside the EU during processing.

#### **11. PROCESSOR**

A personal data processor within the meaning of Art. 4(8) of the General Data Protection Regulation or a third party authorised by the Controller to process the personal data can participate in the processing of the personal data. In such cases the Controller minimises the risk of unauthorised access, destruction, processing or loss of personal data.

#### **12. AUTOMATIC DECISION-MAKING AND PROFILING**

Automatic decision-making is understood to be decision-making using technological means or based on the results of activities of technological means without free decision-making by a person.

Profiling is understood to be the use of personal data to assess some personal aspects of a person, for example an estimate of his/her work output, economic situation, medical condition, personal preferences, interests, reliability, etc.

There is NO automatic decision-making in connection with the processing of personal data.

There is NO profiling in connection with the processing of personal data.

## II. JOB SEEKERS

### 1. CONTROLLER

The personal data controller is **MyClinic s.r.o.**, having its registered office at: Generála Píky 430/26, 160 00 Prague 6 - Dejvice, company ID number: 01490575, entered in the Commercial Register kept at the Municipal Court in Prague, File Ref. C 207465 (hereinafter the “**Controller**”).

### 2. YOUR RIGHTS

In relation to processing by the Controller, you (the data subject) have the following rights:

- a. **ACCESS** – this is the right to information about whether your personal data are processed or not. If personal data are processed, you also have the right to information about processing to the prescribed extent and a right, under certain conditions, to obtain a copy of the data processed;
- b. **WITHDRAWAL OF CONSENT** – consent to inclusion on the list of potential job seekers may be withdrawn at any time in the method stipulated [HERE](#). The withdrawal of consent will not have an influence on the lawfulness of personal data processing that was performed before it was withdrawn. The withdrawal of consent will terminate the processing of your data for the purpose of offering a job;
- c. **RECTIFICATION** – the right to request rectification, if personal data processed are inaccurate. Or the right to request supplementation, if data are not complete;
- d. **ERASURE** (“right to be forgotten”) – the right to request, under the conditions stipulated by legal regulations (withdrawal of consent, end of contract, unlawfulness of processing) the erasure of data;
- e. **RESTRICTION OF PROCESSING** – the right to request a designation and possible restriction (suspension) of processing until verification of the accuracy of data, the lawfulness of processing, dealing with an objection or because of the protection of your interests (claiming, protection or defence of rights and legal interests);
- f. **COMPLAINT** – the right to contact the Office for Personal Data Protection with a complaint about the Controller, processing or the conditions for claiming rights. For contact and other details about the Office see [www.uoou.cz](http://www.uoou.cz);
- g. **PORTABILITY** – the right, under the conditions stipulated by legal regulations, to obtain data for further processing by another entity you designate that you hand the data over to, or where you request their direct handover for further processing by another entity.

You also have a right to:

- **OBJECT** – the right to request that your personal data are not further processed because of legitimate interests of the Controller or for marketing purposes.

Regarding the individual rights, their detailed characteristics, the conditions for their arising and claiming and the procedure for claiming them see [HERE](#).

The Controller **has not** appointed for the processing of personal data of job seekers a **PERSONAL DATA PROTECTION OFFICER**.

### 3. PURPOSE OF PROCESSING

- i.) The Controller processes a job seeker’s personal data for a position to be filled for the purpose of: selecting the most suitable job seeker for the relevant position and concluding a contract of employment.
- ii.) If a job seeker expresses an interest in the sending of job offers, in the event he/she did not succeed in selection proceedings for a position advertised or sought employment without a position being advertised, he/she hereby grants consent to personal data processing for the following purpose: sending job offers corresponding to his/her qualifications, completed education and experience.

### 4. LEGAL BASIS FOR PROCESSING

The legal basis for processing personal data is:

- In the case of the purpose in accordance with para. 3(i), it is a necessary measure before the conclusion of a contract at the request of a data subject and any subsequent conclusion of a contract (Art. 6(1)(b) of the General Data Protection Regulation);

- In the case of para. 3(ii), it is the consent of the job seeker.

## **5. EXTENT OF DATA that is processed**

- The Controller processes, in the case of a purpose in accordance with para. 3(i), data to the following extent: identification and contact data, data about completed education, qualifications and prior experience;
- A job seeker, in the case of para. 3(ii), grants his/her consent to personal data processing to the following extent: Identification and contact data, data about completed education, qualifications and prior experience, data about the result of selection proceedings for a job, if he/she previously participated in them for a position with the Controller.

## **6. PROVISION OF DATA IS NECESSARY or VOLUNTARY**

- In the case of the processing of personal data in accordance with para. 3(i), the provision of data is necessary for participation in selection proceedings. If the data are not provided, it is not possible to include a job seeker in selection proceedings;
- In the case of processing in accordance with para. 3(ii), the provision of data is voluntary. If no data are provided, a job seeker may not be included on the list of parties interested in employment at the company.

## **7. PERIOD for which personal data are stored and processed**

- In the case of processing of personal data in accordance with para. 3(i), the data are stored until the end of selection proceedings.
- In the case of processing in accordance with para. 3(ii), consent is granted for 2 years.

## **8. RECIPIENTS and other entities to whom personal data can be provided**

Personal data will be provided to the following recipients (categories of recipients): state bodies and other entities as a part of the performance of duties stipulated by legal regulations (e.g. tax administrators, courts, bailiffs, authorities active in criminal proceedings).

## **9. SOURCE OF PERSONAL DATA**

The Controller obtains personal data directly from a data subject or in the cases foreseen by law from a job seeker's previous employer.

## **10. THIRD COUNTRIES**

The personal data are NOT handed over outside the EU during processing.

## **11. PROCESSOR**

A personal data processor within the meaning of Art. 4(8) of the General Data Protection Regulation or a third party authorised by the Controller to process the personal data may participate in the processing of the personal data. In such cases the Controller minimises the risk of unauthorised access, destruction, processing or loss of personal data.

## **12. AUTOMATIC DECISION-MAKING AND PROFILING**

Automatic decision-making is understood to be decision-making using technological means or based on the results of activities of technological means without free decision-making by a person.

Profiling is understood to be the use of personal data to assess some personal aspects of a person, for example an estimate of his/her work output, economic situation, medical condition, personal preferences, interests, reliability, etc.

There is NO automatic decision-making in connection with the processing of personal data.

There is NO profiling in connection with the processing of personal data.

### III. EMPLOYEES

#### 1. CONTROLLER

The personal data controller is **MyClinic s.r.o.**, having its registered office at: Generála Píky 430/26, 160 00 Prague 6 - Dejvice, company ID number: 01490575, entered in the Commercial Register kept at the Municipal Court in Prague, File Ref. C 207465 (hereinafter the “**Controller**”).

#### 2. YOUR RIGHTS

In relation to the relevant processing, you have the following rights:

- a. **ACCESS** – the right to information about whether your personal data are processed or not. If personal data are processed, also the right to information about processing to the prescribed extent and a right, under certain conditions, to obtain a copy of the data processed;
- b. **RECTIFICATION** – the right to request rectification, if personal data processed are inaccurate. Or the right to request supplementation, if data are not complete;
- c. **ERASURE** (“right to be forgotten”) – the right to request, under the conditions stipulated by legal regulations (withdrawal of consent, end of contract, unlawfulness of processing) the erasure of data;
- d. **RESTRICTION OF PROCESSING** – the right to request a designation and possible restriction (suspension) of processing until verification of the accuracy of data, the lawfulness of processing, dealing with an objection or because of the protection of your interests (claiming, protection or defence of rights and legal interests);
- e. **COMPLAINT** – the right to contact the Office for Personal Data Protection with a complaint about the Controller, processing or the conditions for claiming rights. For contact and other details about the Office see [www.uouu.cz](http://www.uouu.cz).

You also have a right to:

- **OBJECT** – the right to request that your personal data are not further processed because of legitimate interests of the Controller or for marketing purposes.

Regarding the individual rights, their detailed characteristics, the conditions for their arising and claiming and the procedure for claiming them see [HERE](#).

The Controller **has not** appointed for the processing of personal data of employees a **PERSONAL DATA PROTECTION OFFICER**.

#### 3. PURPOSE OF PROCESSING

The Controller processes personal data for the purpose: implementation of basic labour and legal relationship between employee and employer. Performance of employer’s legal obligations (mandatory records in accordance with the Labour Code, social and health insurance, tax liabilities) and obligations resulting from a contract.

#### 4. LEGAL BASIS FOR PROCESSING

The legal basis for processing personal data is: performance of the Controller’s legal obligations, as result of labour and legal regulations, regulations on social security and tax regulations (Art. 6(1)(c) of the General Data Protection Regulation) and performance of a contract with an employee (Art. 6(1)(b) of the General Data Protection Regulation).

#### 5. EXTENT OF DATA that is processed

The Controller processes the following personal data for the aforementioned purpose: employee’s identification and contact details, qualification data, data about the course of the employment relationship (in particular hours worked, salary, statutory payments, liability claims, breaches of discipline at work, industrial accidents and industrial diseases, holiday used, bank details or the number and age of children), data about health insurance, including birth number, data related to tax records (when claiming discounts, including data about husband/wife and children, including birth numbers), data related to other labour and legal obligations of the employer resulting from legal regulations, data necessary for the performance of the employer’s duties in accordance with regulations on social security and regulations on employment.



## **6. PROVISION OF DATA IS MANDATORY**

The processing of personal data related to the implementation of a labour and legal relationship is imposed on the employer by the law or is necessary for compliance with a contract with an employee.

The provision of data by an employee is therefore mandatory; the non-provision of mandatory data can be a breach of discipline at work, or could lead to the arising of the obligation to compensate damage – damage could arise, for example, through the imposition of a public-law penalty (fine) on the employer for an infringement consisting of non-making of a mandatory report to the competent government authority (e.g. the District Social Security Administration) in time (e.g. registering an employee for participation in insurance).

## **7. PERIOD for which personal data are stored and processed**

The Controller processes personal data: in relation to individual processing of personal data established by the law for the period stipulated by the law, in the case of data necessary for the performance of a contract of employment, for the period of implementation of the basic labour and legal relationship (employment relationship, agreement on performance of work or on work activity), or, if necessary for compliance with partial obligations (e.g. non-compete clause) or for claiming or defending the Controller's rights (e.g. liability for damage, dispute on invalidity of termination of employment relationship, proving compliance with public-law duties, paying receivables, etc.).

## **8. RECIPIENTS and other entities to whom personal data can be provided**

Personal data will be provided to the following recipients (categories of recipients): state bodies and other entities as a part of the performance of duties stipulated by legal regulations (e.g. tax administrators, courts, bailiffs, authorities active in criminal proceedings).

## **9. SOURCE OF PERSONAL DATA**

The Controller obtains the personal data directly from data subjects or from the Controller's activities and/or from third parties.

## **10. THIRD COUNTRIES**

The personal data are NOT handed over outside the EU during processing.

## **11. PROCESSOR**

A personal data processor within the meaning of Art. 4(8) of the General Data Protection Regulation or a third party authorised by the Controller to process the personal data can participate in the processing of the personal data. In such cases the Controller minimises the risk of unauthorised access, destruction, processing or loss of personal data.

## **12. AUTOMATIC DECISION-MAKING AND PROFILING**

Automatic decision-making is understood to be decision-making using technological means or based on the results of activities of technological means without free decision-making by a person.

Profiling is understood to be the use of personal data to assess some personal aspects of a person, for example an estimate of his/her work output, economic situation, medical condition, personal preferences, interests, reliability, etc.

There is NO automatic decision-making in connection with the processing of personal data.

There is NO profiling in connection with the processing of personal data.

## IV. CLIENTS (PATIENTS), THEIR REPRESENTATIVES AND CLOSE PERSONS

### 1. CONTROLLER

The personal data controller is **MyClinic s.r.o.**, having its registered office at: Generála Píky 430/26, 160 00 Prague 6 - Dejvice, company ID number: 01490575, entered in the Commercial Register kept at the Municipal Court in Prague, File Ref. C 207465 (hereinafter the “**Controller**”).

### 2. YOUR RIGHTS

In relation to the relevant processing, you have the following rights:

- a. **ACCESS** – the right to information about whether your personal data are processed or not. If personal data are processed, also the right to information about processing to the prescribed extent and a right, under certain conditions, to obtain a copy of the data processed;
- b. **RECTIFICATION** – the right to request rectification, if personal data processed are inaccurate. Or the right to request supplementation, if data are not complete;
- c. **ERASURE** (“right to be forgotten”) – the right to request, under the conditions stipulated by legal regulations (withdrawal of consent, end of contract, unlawfulness of processing) the erasure of data;
- d. **RESTRICTION OF PROCESSING** – the right to request a designation and possible restriction (suspension) of processing until verification of the accuracy of data, the lawfulness of processing, dealing with an objection or because of the protection of your interests (claiming, protection or defence of rights and legal interests);
- e. **COMPLAINT** – the right to contact the Office for Personal Data Protection with a complaint about the Controller, processing or the conditions for claiming rights. For contact and other details about the Office see [www.uoou.cz](http://www.uoou.cz).
- f. **PORTABILITY** – the right, under the conditions stipulated by legal regulations, to obtain data for further processing by another entity you designate that you hand the data over to, or where you request their direct handover for further processing by another entity.

You also have a right to:

- **OBJECT** – the right to request that your personal data are no longer processed for the performance of tasks in the public interest, because of the legitimate interests of the Controller or a third party or for marketing purposes.

Regarding the individual rights, their detailed characteristics, the conditions for their arising and claiming and the procedure for claiming them see [HERE](#).

For the processing of personal data in connection with healthcare The Controller **has** appointed a **PERSONAL DATA PROTECTION OFFICER**. The personal data protection officer can be contacted via e-mail: [gdpr@myclinic.cz](mailto:gdpr@myclinic.cz).

### 3. PURPOSE OF PROCESSING

The Controller processes personal data for the purpose of providing healthcare services to clients—patients; the provision of healthcare services includes, inter alia, statements of account for healthcare services, reporting to a health insurance company, if the services are reimbursed by a health insurance company, provision of related and additional healthcare services in collaborating healthcare facilities upon client's request, etc. Together with this, the purpose of processing personal data is performance of related statutory duties of the Controller, in particular the maintenance of healthcare documentation, tax purposes, the maintenance of accounts, mandatory reports for registers, etc.

In the case of representatives and close persons to a patient, the purpose of processing personal data is performance of legal duties – full provision of healthcare services to a patient, the maintenance of a patient's healthcare documentation, records of consents granted to the provision of a healthcare service and information about a patient's medical condition.

### 4. LEGAL BASIS FOR PROCESSING

The legal basis for processing personal data is: measures necessary before concluding a contract at the request of the data subject and performance of a contract with the data subject (Art. 6(1)(b) of the General Data Protection Regulation). It is also covered by the legal title of performing the Controller's legal obligations that result from valid legal regulations (Art. 6(1)(c) of the GDPR).

## 5. EXTENT OF DATA that is processed

The Controller processes the following personal data for the aforementioned purpose:

- **Patient—client:** identification and contact data, data about medical condition (anamnesis, data about examinations and healthcare services performed, or about the diagnosis ascertained, treatment, medicinal products prescribed, medical devices, the results of comprehensive and control examinations, any informed consent or non-consent of a patient to individual measures and treatment), any work positions, the employer and the employer's contact details, and data about other significant facts related to the provision of healthcare services (record of patient's legal capacity, record of recognition, termination and changes to temporary sick leave, record of monitoring data about medical condition, etc., data about payment card).
- **Representatives and persons close to a patient:** identification and contact details or data about medical condition (anamnesis).

## 6. PROVISION OF DATA IS MANDATORY or necessary.

Healthcare services cannot be provided without the provision of data. The data are necessary both for the full provision of healthcare services and for performance of the Controller's related duties.

## 7. PERIOD for which personal data are stored and processed

The Controller processes personal data: in accordance with individual statutory periods for individual types of processing for the purpose of performing the duties of a medical services provider (in particular Decree No. 98/2012 Coll., on medical documentation, which sets out the period for which it is necessary to maintain a patient's medical documentation), as well as in accordance with legal regulations governing tax records.

## 8. SOURCE OF PERSONAL DATA

The Controller obtains personal data from patients and their close persons or from their representatives, from its own activities and from other persons authorised to handle data (e.g. from other medical services providers).

## 9. RECIPIENTS and other entities to whom personal data can be provided

Personal data will be provided to the following recipients (categories of recipients): state bodies and other entities as a part of the performance of duties stipulated by legal regulations (e.g. other healthcare service providers, health insurance companies, the State Institute for Drug Control, authorities active in criminal proceedings and courts). Personal data including name, surname, date of birth, address, contact information, and information about health insurance may be provided by healthcare facilities where the Controller arranges an appointment or other healthcare services for the client.

## 10. THIRD COUNTRIES

During processing, personal data will NOT be handed over outside the EU, with the exception of patients - persons insured by a foreign insurance company with its registered office outside the EU.

## 11. PROCESSOR

A personal data processor within the meaning of Art. 4(8) of the General Data Protection Regulation or a third party authorised by the Controller to process the personal data may participate in the processing of the personal data. In such cases the Controller minimises the risk of unauthorised access, destruction, processing or loss of personal data.

## 12. AUTOMATIC DECISION-MAKING AND PROFILING

Automatic decision-making is understood to be decision-making using technological means or based on the results of activities of technological means without free decision-making by a person.

Profiling is understood to be the use of personal data to assess some personal aspects of a person, for example an estimate of his/her work output, economic situation, medical condition, personal preferences, interests, reliability, etc.

There is NO automatic decision-making in connection with the processing of personal data.

There is NO profiling in connection with the processing of personal data.



## V. MARKETING

### 1. CONTROLLER

The personal data controller is **MyClinic s.r.o.**, having its registered office at: Generála Píky 430/26, 160 00 Prague 6 - Dejvice, company ID number: 01490575, entered in the Commercial Register kept at the Municipal Court in Prague, File Ref. C 207465 (hereinafter the “**Controller**”).

### 2. YOUR RIGHTS

In relation to the relevant processing, you have the following rights:

- a **WITHDRAWAL OF CONSENT** – consent can be withdrawn at any time in the manner stipulated [HERE](#). The withdrawal of consent will not have an influence on the lawfulness of personal data processing that was performed before it was withdrawn. The withdrawal of consent will terminate the processing of your data for marketing purposes;
- b **ACCESS** – the right to information about whether your personal data are processed or not. If personal data are processed, also the right to information about processing to the prescribed extent and a right, under certain conditions, to obtain a copy of the data processed;
- c **RECTIFICATION** – the right to request rectification, if personal data processed are inaccurate. Or the right to request supplementation, if data are not complete;
- d **ERASURE (“right to be forgotten”)** – the right to request, under the conditions stipulated by legal regulations (withdrawal of consent, end of contract, unlawfulness of processing) the erasure of data;
- e **RESTRICTION OF PROCESSING** – the right to request a designation and possible restriction (suspension) of processing until verification of the accuracy of data, the lawfulness of processing, dealing with an objection or because of the protection of your interests (claiming, protection or defence of rights and legal interests);
- f **COMPLAINT** – the right to contact the Office for Personal Data Protection with a complaint about the Controller, processing or the conditions for claiming rights. For contact and other data about the Office see [www.uoou.cz](http://www.uoou.cz);
- g **PORTABILITY** – the right, under the conditions stipulated by legal regulations, to obtain data for further processing by another entity you designate that you hand the data over to, or where you request their direct handover for further processing by another entity.

You also have a right to:

- **OBJECT** – the right to request that your personal data are no longer processed for the performance of tasks in the public interest, because of the legitimate interests of the Controller or a third party or for marketing purposes.

Regarding the individual rights, their detailed characteristics, the conditions for their arising and claiming and the procedure for claiming them see [HERE](#).

The Controller **has not** appointed for the processing of personal data in marketing a **PERSONAL DATA PROTECTION OFFICER**.

### 3. PURPOSE OF PROCESSING

The Controller processes personal data for the purpose of marketing: targeted offers of the Controller’s services and offers of events arranged by the Controller. When targeting an offer, the Controller uses information about the prior drawing of services by a data subject and information provided by a data subject, including the use of cookies.

### 4. LEGAL BASIS FOR PROCESSING

The legal basis for personal data processing is: data subject’s consent (Art. 6(1)(a) of the General Data Protection Regulation).

### 5. EXTENT OF DATA that is processed

The Controller processes the following personal data for the aforementioned purpose: Identification and contact details, i.e. first name, surname, title, telephone number, e-mail address, honorific, date of birth, health insurance company, data about medical condition, information about previous use of services and preferences of data subject.

**6. PROVISION OF DATA IS VOLUNTARY.**

The provision of personal data is voluntary.

**7. PERIOD for which personal data are stored and processed**

The Controller processes the personal data: until consent is withdrawn.

**8. SOURCE OF PERSONAL DATA**

The Controller obtains the personal data directly from a data subject and through the use of cookies.

**9. RECIPIENTS and other entities to whom personal data can be provided**

Personal data will be provided to the following recipients (categories of recipients): public power bodies and other entities as a part of the performance of duties stipulated by legal regulations (e.g. tax administrators, courts, bailiffs, authorities active in criminal proceedings).

**10. THIRD COUNTRIES**

The personal data are NOT handed over outside the EU during processing.

**11. PROCESSOR**

A personal data processor within the meaning of Art. 4(8) of the General Data Protection Regulation or a third party authorised by the Controller to process the personal data may participate in the processing of the personal data. In such cases the Controller minimises the risk of unauthorised access, destruction, processing or loss of personal data.

**12. AUTOMATIC DECISION-MAKING AND PROFILING**

Automatic decision-making is understood to be decision-making using technological means or based on the results of activities of technological means without free decision-making by a person.

Profiling is understood to be the use of personal data to assess some personal aspects of a person, for example an estimate of his/her work output, economic situation, medical condition, personal preferences, interests, reliability, etc.

There is NO automatic decision-making in connection with the processing of personal data.

There IS profiling in connection with the processing of personal data. Specifically, profiling of preferences in accordance with prior drawing of services, a data subject's preferences and the use of cookies will be applied.

## VI. VIDEO SURVEILLANCE SYSTEM

### 1. CONTROLLER

The personal data controller is **MyClinic s.r.o.**, having its registered office at: Generála Píky 430/26, 160 00 Prague 6 - Dejvice, company ID number: 01490575, entered in the Commercial Register kept at the Municipal Court in Prague, File Ref. C 207465 (hereinafter the “**Controller**”).

### 2. YOUR RIGHTS

In relation to the relevant processing, you have the following rights:

- a. **ACCESS** – the right to information about whether your personal data are processed or not. If personal data are processed, also the right to information about processing to the prescribed extent and a right, under certain conditions, to obtain a copy of the data processed;
- b. **ERASURE** (“right to be forgotten”) – the right to request, under the conditions stipulated by legal regulations (withdrawal of consent, end of contract, unlawfulness of processing) the erasure of data;
- c. **RESTRICTION OF PROCESSING** – the right to request a designation and possible restriction (suspension) of processing until verification of the accuracy of data, the lawfulness of processing, dealing with an objection or because of the protection of your interests (claiming, protection or defence of rights and legal interests);
- d. **COMPLAINT** – the right to contact the Office for Personal Data Protection with a complaint about the Controller, processing or the conditions for claiming rights. For contact and other details about the Office see [www.uoou.cz](http://www.uoou.cz).

You also have a right to:

- **OBJECT** – the right to request that your personal data are not further processed because of legitimate interests of the Controller or for marketing purposes.

Regarding the individual rights, their detailed characteristics, the conditions for their arising and claiming and the procedure for claiming them see [HERE](#).

The Controller **has not** appointed for the processing of personal data from video surveillance system a **PERSONAL DATA PROTECTION OFFICER**.

### 3. PURPOSE OF PROCESSING

The Controller processes personal data for the purpose of protection of individual’s life and health in the premises of the clinic and for the purpose of protection of property against theft, damage or vandalism.

### 4. LEGAL BASIS FOR PROCESSING

The legal basis for processing personal data is: Controller’s legitimate interest (Art. 6(1)(f) of the General Data Protection Regulation.

### 5. EXTENT OF DATA that is processed

The Controller processes the following personal data for the aforementioned purpose: video recordings of individuals in the monitored premises of the clinic. Monitored area is provided with warning sign.

### 6. PROVISION OF DATA IS NECESSARY

Controller’s clinic cannot be visited without the provision of data.

### 7. PERIOD for which personal data are stored and processed

Video footage is stored for the period of 10 days. In the case of exercising the right for which protection the video surveillance system serves, the storage period may be longer (e.g. for the period of time of the proceeding before the police authority or court proceeding etc.).

### 8. SOURCE OF PERSONAL DATA

The Controller obtains the personal data directly from data subjects in the clinic.

### 9. RECIPIENTS and other entities to whom personal data can be provided

Personal data will be provided to the following recipients (categories of recipients): state bodies when exercising the protection of rights and claims and in cases provided by law (e.g. authorities active in criminal proceedings).

#### **10. THIRD COUNTRIES**

The personal data are NOT handed over outside the EU during processing.

#### **11. PROCESSOR**

A personal data processor within the meaning of Art. 4(8) of the General Data Protection Regulation or a third party authorised by the Controller to process the personal data can participate in the processing of the personal data. In such cases the Controller minimises the risk of unauthorised access, destruction, processing or loss of personal data.

#### **12. AUTOMATIC DECISION-MAKING AND PROFILING**

Automatic decision-making is understood to be decision-making using technological means or based on the results of activities of technological means without free decision-making by a person.

Profiling is understood to be the use of personal data to assess some personal aspects of a person, for example an estimate of his/her work output, economic situation, medical condition, personal preferences, interests, reliability, etc.

There is NO automatic decision-making in connection with the processing of personal data.

There is NO profiling in connection with the processing of personal data.



## VII. PHONE CALL RECORDS

Regarding the fact that My Clinic s.r.o. has decided to record telephone calls to improve its services, and as the recording of phone calls typically involves the processing of personal data, both of clients and third parties (e.g., potential clients), My Clinic hereby provides the affected individuals, in accordance with the provisions of relevant laws, with the following information regarding the processing of personal data.

The Controller of the processed personal data is MyClinic s.r.o., with its registered office at Generála Píky 430/26, 160 00 Prague 6 - Dejvice, ID Number 01490575, registered in the Commercial Register kept by the Municipal Court in Prague, Section C, File No. 207465 (hereinafter referred to as "My Clinic" or "Controller"). Personal data is processed for the purpose of improving services, fulfilling contractual obligations of the Controller, and monitoring how our employees fulfill their obligations towards you, the clients. Recordings may also serve as evidence in potential judicial or administrative proceedings.

My Clinic retains recordings for the period determined by legal regulations and for legitimate interests (e.g., handling complaints, etc.) as long as the client or the Controller is entitled, according to the relevant legal regulations, to assert their rights and claims arising from such communication. In light of the above, the recordings will be retained for a maximum of 14 months and will be automatically deleted thereafter.

Considering that a telephone call is being recorded, it is not possible to identify in advance which personal data this processing method will concern. Therefore, it will involve personal data that you provide to us during the telephone call. It will likely include the following categories of personal data: basic identification data, descriptive and contact information, and information about health status and health insurance.

The processing of your personal data will primarily involve the following methods: data collection, storage on data carriers, accessibility, use, transfer, retention, and deletion.

Recordings (or personal data contained therein) may be accessible to authorized employees of the Controller, public authorities, and other entities within the scope of fulfilling obligations stipulated by legal regulations, as well as to entities to whom the Controller is authorized to provide personal data for the purpose of protecting their rights and obligations arising from contract negotiations or their own contractual relationship.

In relation to the processing of personal data, there is NO automated decision-making or profiling.

**RIGHTS AND ASSERTION THEREOF  
GENERALLY REGARDING THE ASSERTING OF RIGHTS**

**ARTICLE I  
GENERALLY REGARDING THE ASSERTING OF RIGHTS**

**1. CHANNELS FOR ASSERTION OF RIGHTS**

Rights may be asserted under the conditions stipulated below:

- a. Through the Controller's data box: z35tavt;
- b. Through the e-mail address: [gdpr@myclinic.cz](mailto:gdpr@myclinic.cz);
- c. Through a written submission to the address: Generála Ptky 430/26, 160 00 Prague 6 - Dejvice.

**2. IDENTIFICATION AND SECURE COMMUNICATION**

**The assertion of rights shall not be to the detriment of third-party rights and freedoms.** For this reason, the Controller has the right and obligation, in the **necessary cases, to identify the party asserting rights**. For the aforementioned reasons, the Controller must choose secure and reliable communication. **Reliable communication where it is not necessary to further verify the addressee's identity is always regarded as including** communication by e-mail messages that have a verified electronic signature, communication by data box, communication using a postal services provider, where a document is signed and the signature of the person acting has been notarised or a reply sent to the addressee's attention only.

**3. ORAL ASSERTION OF RIGHTS**

Exceptionally, if the authorised person so requests, it is possible to provide information or enable the asserting of rights **orally**. A written record will be made of the oral provision of information or oral assertion of rights by a party. A condition for the oral assertion of rights, if the relevant person is not personally known, is the verification of his/her identity using an ID card, passport, driver's licence or other document that makes it clear that the rights are being claimed by a person to whom they belong.

**4. REQUEST IN ELECTRONIC FORM**

If a request is submitted or if rights are asserted through an electronic filing, the reply will also be sent in electronic form, if the relevant person did not request a different method.

**5. COSTS**

Information provided to data subjects, the provision of copies to data subjects, all statements and all measures related to the assertion of a data subject's rights is **free of charge**.

**6. REJECTION AND FEE**

If a request (assertion of a right) by a data subject is evidently unjustified or unreasonable, in particular because it is the same or mostly the same as a previous request or an unreasonably wide-ranging request that cannot be dealt with by the statutory deadline,

- a) Dealing with the request is conditional on the payment of a deposit **on administrative costs** related to the provision of the requested information or to a statement or taking the requested actions  
– a deposit may be requested up to the amount of the expected costs, where information, a statement, etc, is provided to a data subject after the payment in full of costs incurred; or
- b) **The request will not be satisfied or assertion of the right will be rejected with a reasoning in writing.**

**7. DEADLINE FOR PROCESSING**

A data subject's requests and replies to the assertion of a data subject's rights are dealt with promptly. A reply containing requested information or describing the measures taken in connection with a request by a data subject, etc. must be delivered to the data subject no later than 30 days after the day the request is delivered. If it is not possible to deal with a matter for serious reasons by the set deadline, no later than by such deadline a data subject will be sent a written or e-mail message stating that the deadline will not be complied with and the reasons that are the cause, and the deadline by which the matter will be dealt with will be notified; a deadline may not be put back by more than 60 days.

**ARTICLE II**  
**RIGHT TO ACCESS AND COPY**

1. If it is requested by a data subject, a confirmation will be provided stating whether processing of his/her personal data is occurring.
2. If a data subject's personal data are processed, the data subject will be provided with information about:
  - a) The purposes of processing and the legal basis for personal data processing, including a reference to the provisions of a legal regulation, and about the extent and consequences of processing;
  - b) Any recipient or category of recipients of personal data;
  - c) The handover of personal data to third countries, if it is to be implemented, including information about suitable guarantees for the safety of data handed over to a third country;
  - d) The period for which personal data are stored and, if it is not possible to determine such period, the criteria for determining the storage period;
  - e) The right to request access to personal data concerning the data subject, the right to request their rectification or erasure, the right to request the restriction of processing, the right to make an objection to personal data processing and the conditions for the arising of individual rights and the method of claiming them—a data subject will always be provided only with information about rights whose assertion may be taken into consideration in connection with the relevant personal data processing;
  - f) The right to portability of data, the conditions for its arising and the conditions for its claiming—if the assertion of this right may be taken into consideration with regard to the character of personal data processing;
  - g) Whether automatic decision-making is taking place, and rights of a data subject related to automatic decision-making;
  - h) The source of personal data and, if appropriate, that personal data come from publicly-available sources;
  - i) The right to submit a complaint to the supervisory authority (the Office for Personal Data Protection);
  - j) Whether automatic decision-making is taking place in the form of profiling and the importance and foreseen consequences of such processing for the data subject, if implemented.
3. A data subject is entitled to request a copy of personal data processed. The first provision of a copy is free of charge. There is a charge for additional copies. Article I(6) applies also here.
4. If the provision of a copy could damage third-party rights and freedoms (e.g. a copy contains third-party personal data in relation to the disclosure of which the data subject that requested the copy has no legal reason), the copy will be anonymised in an appropriate manner. If anonymisation is not possible or if the requested information would lose value through the relevant anonymisation, a copy will not be provided.

**ARTICLE III**  
**RIGHT TO RECTIFICATION**

1. A data subject is entitled to the rectification of personal data processed, if the personal data processed are inaccurate from the viewpoint of the purpose of processing or if they are incomplete from the viewpoint of the purpose of personal data processing. A data subject may request rectification (including supplementation) of personal data processed or their supplementation.
2. If a data subject claims a right to the rectification of personal data processed, the Controller will promptly perform a check on the processing of personal data regarding which the right to rectification is claimed.
3. If the Controller reaches the conclusion that an objection is justified, even if only partially, it will promptly arrange a remedy, i.e. the rectification of the personal data processed or their supplementation.
4. A data subject will be notified in writing or by e-mail of the result of an investigation and measures taken.

**ARTICLE IV  
RIGHT TO ERASURE**

1. A data subject is entitled, regarding the personal data controller, to the erasure of personal data that concern him/her, only if:
  - a) The personal data are not needed for the purposes for which they were gathered or otherwise processed;
  - b) The data subject withdraws consent to personal data processing and there are no other legal grounds for personal data processing;
  - c) The data subject makes a relevant objection to personal data processing;
  - d) The personal data are processed unlawfully, in particular without legal grounds for personal data processing;
  - e) The erasure of personal data is required by compliance with a legal obligation, as results from a legal regulation or a decision issued based on a legal regulation;
  - f) The personal data were gathered in connection with an offer of information society services in accordance with Art. 8(1) of the General Data Protection Regulation.
2. The erasure of personal data is understood to be the physical destruction of personal data media (e.g. the destruction of documents) or their erasure (from multimedia carriers) or other permanent exclusion from further personal data processing.
3. If a data subject claims a right to erasure, the Controller will examine the data subject's request. In the event a data subject's request is legitimate, at least in part, it will erase the data to the necessary extent. Article I(7) also applies here.
4. Until a data subject's request is dealt with, the personal data regarding which the right to erasure was exercised will be designated.
5. Personal data may not be deleted, if their processing is necessary:
  - a) For the exercise of a right to free speech and freedom of information;
  - b) For compliance with a legal duty resulting from legal regulations;
  - c) Due to a public interest in the area of public health (Art. 9(2)(h) and (i) and Art. 9(3) of the General Data Protection Regulation);
  - d) For the purposes of archiving in the public interest, for the purposes of scientific and historical research or for statistical purposes, if it is likely that erasure would make impossible or seriously endanger the achievement of the aims of the aforementioned processing;
  - e) For the determination, claiming and exercising of the Controller's rights.

**ARTICLE V  
RIGHT TO RESTRICT PROCESSING**

1. If a data subject exercises a right to restrict processing regarding specific personal data processing, the Controller will promptly assess the relevance of the data subject's request, primarily from the viewpoint of compliance with the conditions for claiming a right to restrict processing; when assessing a request it will base conclusions on the content of the request and on other circumstances and facts concerning the relevant personal data processing.
2. The data subject is entitled to restriction of personal data processing in the following cases:
  - a) The data subject denies the accuracy of the personal data;
  - b) The processing is unlawful and the data subject rejects the erasure of the personal data and, instead of this, requests a restriction of their use;
  - c) The controller no longer needs the personal data for the purposes of processing, but the data subject requests them for the determination, exercise or defence of legal claims;
  - d) The data subject objected to processing.
3. The personal data affected by the restriction of processing are designated.
4. If processing is restricted, such personal data may, with the exception of their storage, be processed only with the consent of the data subject, or for the determination, exercise or defence of legal claims, to protect the rights of other natural persons or legal entities or due to an important public interest.
5. Before the cancellation of a restriction on processing of personal data, the data subject is notified in

writing or by e-mail of the cancellation of the restriction. The statement will specify the moment the restriction on personal data processing is lifted and the reason for which it is lifted.

## **ARTICLE VI RIGHT TO PORTABILITY**

1. If personal data obtained from a data subject (either directly handed over by him/her or data obtained about his/her activities, etc.) and that concern such data subject are the subject of personal data processing, such data subject has the right to the portability of such data, if processing is based on the consent of the affected data subject or it is processing based on a contract with the data subject and if it is implemented automatically. The right to portability does not cover data and information created by the Controller based on data obtained from the data subject (e.g. profiling of the data subject's foreseen consumer behaviour based on data obtained from the data subject, etc.).
2. As a part of the right to portability, a data subject may request:
  - a) The handover of the personal data that are the subject of the right to portability, in a structured, ordinarily-used and machine-readable format, in particular it is not possible to use a format that requires a special paid licence or a format excluding further editing or other handling (processing) of personal data (e.g. \*.pdf), to the attention of the data subject;
  - b) The handover of the personal data that are the subject of the right to portability, in a structured, ordinarily-used and machine-readable format, in particular it is not possible to use a format that requires a special paid licence or a format excluding further editing or other handling (processing) of personal data (e.g. \*.pdf), to another personal data controller that the data subject designates in his/her request for personal data portability.
3. A data subject's request will not be granted, inter alia (Art. 1(6)), if complying with the data subject's request would cause detriment to the rights and freedoms of other persons (data subjects).
4. A request whose subject is the portability of data in accordance with para. 2(b) is not granted if it is not technically feasible, where handover is regarded as not technically feasible if such handover cannot be arranged in an appropriate manner with regard to the technology available given the nature of the personal data handed over and the related risks.
5. Information about the purpose of personal data processing and, if the data subject so requests, information about personal data processing in accordance with Art. 13 of the General Data Protection Regulation will be attached to personal data handed over.

## **ARTICLE VII AUTOMATIC INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING**

1. A decision regarding a data subject, acts in law regarding a data subject or another measure or procedure as a consequence of which unfavourable legal consequences result for a data subject or where such act could otherwise affect him/her in a similar manner (e.g. automatic rejection of an on-line loan application, electronic searches for job seekers without a person's participation and reviews of a negative decision by the electronic system) cannot be based on an automatic individual decision, including profiling, unless the decision is
  - a) Necessary for the conclusion or performance of a contract between the data subject and the data controller;
  - b) Permitted by legal regulations that stipulate suitable measures ensuring the defence of rights and freedoms and the legitimate interests of data subjects; or
  - c) Based on the express consent of the data subject.
2. In the cases in accordance with para. 1(a) and (c), the Controller will arrange the performance of suitable measures to ensure the protection of rights and freedoms and legitimate interests of the data subject against the negative consequences of automatic individual decision-making. Such measures mean, at least, arranging the option for a data subject to express his/her opinion before the performance of an act with unfavourable consequences and the option of reviewing a decision by a person designated by the Controller and further human involvement, which means, for example, regular reviews of the functionality of the automatic decision-making system and the setting of conditions of functionality in such a manner as to exclude unreasonable unfavourable consequences for the rights and freedoms of a data subject or its legitimate interests.

3. If the subject of processing is sensitive data or if an individual decision pursuant to para. 1 is to be based on sensitive data, it is possible to proceed in accordance with para. 2 only if sufficient guarantees are arranged within the meaning of para. 2 of this article and provided that the legal grounds for personal data processing is the express consent of the data subject within the meaning of Art. 9(2)(a) of the General Data Protection Regulation or it concerns processing necessary due to a significant public interest resulting from legal regulations that is reasonable given the relevant aim, complies with the essence of the right to the protection of data and provides suitable and specific guarantees for the protection of the data subject's basic rights and interests.

#### **ARTICLE VIII RIGHT TO OBJECT**

1. If the legal basis for the processing of personal data is legal title in accordance with Art. 6(1)(e) of the General Data Protection Regulation (performance of a task carried out in the public interest or in the exercise of official authority vested in the controller) or legal title in accordance with Art. 6(1)(f) of the General Data Protection Regulation (processing necessary for the protection of rights and interests of the controller protected by the law), the data subject has the right to object to the relevant personal data processing.
2. If personal data are processed for direct marketing purposes, a data subject is entitled, at any time, to object to personal data processing that concerns him/her for such marketing, which also includes profiling, provided this concerns such direct marketing. If a data subject objects to processing for the purposes of direct marketing, the personal data will no longer be processed for such purposes.
3. If a data subject exercises the right to object, the Controller will examine the objection without undue delay.
4. Until a data subject's objection is dealt with, the relevant personal data or personal data processing will be designated.
5. Personal data against which a legitimate objection was made may no longer be processed, unless:
  - a) There are serious legitimate reasons for further processing that predominate over the data subject's interests, rights and freedoms; or
  - b) Further processing is necessary for the determination, exercise or defence of the Controller's rights.