

# Information on personal data processing for participants in the “Virtual Clinic” programme

The Administrator of your personal data is the company **EUC Premium s.r.o.**, with its registered office at Evropská 859/115, 160 00 Praha 6, Identification no. 267 75 216, entered in the Commercial Register administrated by the Municipal Court in Prague, Section C, File 92970 (hereinafter referred to as the “Administrator”).

## Introductory information

The reason for processing the personal data provided by you consists in your participation based on the establishment of a client (user) account within the “Virtual Clinic” programme operated by the Administrator of personal data on the website at [www.eucpremium.cz](http://www.eucpremium.cz) (hereinafter referred to as the “Programme”). Due to the fact that without such data, it would not be possible to provide services and the benefits of participation in the Programme at an adequate level, we would like to thank you for your trust and assure you that no unauthorised person will gain access to your data. We carefully select all persons who may gain access to your data in connection with the Programme, whether that concerns our employees or contractors. All employees of the Administrator of personal data are bound to strict confidentiality. We also negotiate a confidentiality obligation with all of our contractual partners if they may come into contact with personal data. We consider trust and a high level of data security to be one of the fundamental priorities within our operations.

## Which of your data do we process?

In connection with the Programme, we obtain your personal data directly from you as a holder of a premium card issued by EUC Premium s.r.o.

- **Basic data: e-mail address, password**
- **Personal settings of patient data:** personal name, surname, date of birth, MRN, telephone number, gender, data on the patient’s health condition

## In what form is my personal data processed?

We retain all of your personal data in connection with the Programme in electronic form within the information systems of the company operated by the Administrator.

## Why do we process your data and what is the legal basis for such processing?

The purpose of processing your personal data by the Administrator is administrative assurance of your participation in the Programme. The legal basis for such processing is the contract on provision of Virtual Clinic services, conclusion of which occurs between you (the data subject) and the Administrator (i.e. EUC Premium s.r.o.) upon the establishment of a user account.

If processing of your personal data occurs in connection with the Programme, the Administrator shall do so for the purpose of ensuring the provision of medical services in the sense of the provisions of Act No. 372/2011 Coll., on Healthcare Services and the Conditions of Provision Thereof, as amended.

We are authorised to process your personal data also for the purpose of sending commercial messages (newsletter), provided that you expressed your prior consent to such form of processing. For this purpose, however, we process only the necessary data in such a form that makes it impossible to easily identify you.

To whom can we provide your personal data?

We administrate your personal data within the Administrator's operations, whereas we transfer such data to third parties with your consent as a matter of principle or if such transfer of data is allowed by a binding legal regulation of the Czech Republic or of the European Union.

In order for us to ensure the provision of high-quality care to you, in certain cases we also use external contractors, particularly if this involves technical support for our information system. Processing of any of your personal data may occur in the course of such activities. In such a case, external contractors are in the position of processors in the sense of the provisions of Article 4 (8) of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the "GDPR") or in the position of administrators of personal data in the sense of the provisions of Article 4 (7) of the GDPR. Please be aware that we select our contractors and cooperating processors according to strict criteria and you thus need not be concerned about your data.

We do not transfer your personal data outside of the European Economic Area.

How long do we retain your personal data?

Your personal data is always retained for the absolutely necessary period of your participation in the aforementioned Programme.

Will automated decision-making or profiling occur in connection with the processing of personal data?

Neither automated decision-making nor profiling will occur in connection with the processing of personal data.

What rights do you have in relation to your personal data?

As a data subject, the law confers on you a full range of rights. As a participant in the Programme, you have the following rights in relation to your personal data.

- Right of access to personal data

Of course, you have the right to know the kind of data pertaining to you that is being processed, the purpose and duration of such processing, where we obtained the data and whether and to whom we transfer the data. At the same time, you have the right to information on other rights pertaining to such data. This document in particular serves for your awareness in this regard; nevertheless, we are prepared to provide you with confirmation or clarification regarding any item of this information.

If you request it from us, we will also provide to you, without undue delay, a copy of your processed personal data. In connection with administrative costs, we are authorised to charge a proportionate fee for such copy, especially in the case that it is requested repeatedly. If you submit the request in electronic

form, we will automatically assume that you are interested in provision of information also in electronic form. However, you have the option of requesting provision by other means. Please bear in mind that the rights of other persons cannot be adversely affected by the right to obtain a copy of processed personal data.

- Right to correction of personal data

In the event you determine that the personal data that we process in relation to you is not accurate or complete, you have the right to request that we supplement or correct such data without undue delay, unless a generally binding legal regulation of the Czech Republic or of the EU stipulates otherwise.

- Right to restriction of personal data processing

In certain cases, this right enables you to demand that certain items of your personal data be marked for restricted processing and thus not be the subject of further processing for a certain period. This is not the same as the right to deletion, as restriction of processing is not permanent. You have the right to demand restriction of the processing of your personal data in the case that:

- you refute the accuracy of your data that we are processing; restriction will be imposed for the period necessary to verify the accuracy of the data.
- processing is without a legal basis (e.g. beyond the scope of data that we are authorised to process), but you prefer restriction of processing instead of deletion because, for example, you anticipate that you will provide the data to us in the future.
- we no longer need to process your personal data, but you request the data for the purpose of determining, exercising or defending your legal claims.
- you raise an objection against processing (see the point of instruction on this right below).

If processing is restricted, data can be processed only with your consent or for the purpose of determining, exercising or defending legal claims, for the purpose of protecting the rights of another entity, whether a natural person or legal entity, or for important reasons in the public interest.

- Right to raise objections against personal data processing

You can exercise the right to raise objections against the processing of personal data only in the situation when we would process any of your personal data in the public interest or on the basis of our legitimate interests or for the purposes of direct marketing. In such cases, you can raise an objection at any time. If that happens, we will further process your personal data only if we demonstrate serious, legitimate reasons for doing so (particularly if we need the data for determining, exercising or defending our legal claims). If, however, you raise an objection against data processing for the purpose of direct marketing, we will cease processing your data for such purpose without delay.

- Right to file a complaint with the supervisory authority

Exercising the rights set forth above shall not in any way affect your right to file a complaint with the Office for Protection of Personal Data via the contact information set forth in the introduction to this document. You can find the current contact information on the website of the Office for Protection of Personal Data ([www.uouu.cz](http://www.uouu.cz)). You can file a complaint at any time when you have doubts as to whether your personal data is being processed as it should be, i.e. if you believe your personal data is being processed without authorisation or in conflict with legal regulations.

- Right to deletion

In certain cases, you, as the data subject, have the right to have your personal data deleted. We generally accede to deletion of your personal data when we no longer need such data or we do not have a legal reason to process it. Furthermore, we will delete your personal data if it was processed on the basis of consent and that consent has been withdrawn.

Please bear in mind that, even though this concerns one of the reasons for deletion, it does not mean that we will immediately delete all of your personal data. This right does not apply in the case that processing of personal data continues to be necessary for fulfilment of our legal obligations, archiving purposes, scientific or historical research or for statistical purposes, or for determining, exercising or defending our legal claims.

- Right to withdraw consent to personal data processing

If this involves cases in which your personal data is processed on the basis of consent to personal data processing, you further have the right to withdraw your consent at any time. However, previous processing that we carried out prior to withdrawal of consent shall not be affected in any way by such withdrawal of consent.

#### How can individual rights be exercised?

In all matters associated with the processing of your personal data, whether that involves an enquiry, exercise of rights, filing of a complaint or anything else, you can contact our data protection officer using the following methods:

- by post or in-person upon prior agreement at the address EUC Premium s.r.o. (Identification no.: 267 75 216), Evropská 859/115, 160 00 Prague
- by e-mail at the e-mail address: **dpo@euc.cz**,
- by telephone at +420 731 546 921 from 9:00 a.m. to 3:00 p.m. (not by SMS)

We will handle your request without undue delay, though within one month from the date of its delivery at the latest. In exceptional cases, particularly due to the complexity of your request, we are authorised to extend this period by two months. Of course, we will inform you of any such extension and the rationale for it.

#### List of legal regulations governing the protection of personal data

You can find the most important legislative provisions governing the protection of your personal data in the following legal regulations:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation – GDPR)
- Act No. 110/2019 Coll., on Personal Data Processing
- Act No. 89/2012 Coll., the Civil Code, as amended
- Act No. 372/2011 Coll., on Healthcare Services and the Conditions of Provision Thereof