

Information for relatives of patients

Introductory information

Our main activity is provision of medical care, whether that involves care consisting in prevention, diagnostics, dispensary care, treatment, evaluative care, therapeutic rehabilitative care, nursing care, palliative care or pharmaceutical care. All of these types of medical care have one thing in common – in order to provide them, we need to be aware of a full range of your personal data, particularly data that can be designated as sensitive. Such sensitive data comprises, in particular, data on your health condition and, in certain cases, genetic data, data on your sexual life and other data that is part of the most sensitive area of each of our lives. In legitimate cases, we need to process personal data pertaining to you, i.e. relatives of our patients. We process the needed personal data about you so that we can enable you to exercise the rights that apply to you as a relative of a patient.

We carefully select all persons who may gain access to your personal data, whether that refers to our employees or to our contractors. We consider trust and a high level of data security to be one of the fundamental priorities within our operations.

Which of your personal data do we process? For what purpose do we process your personal data and what legal basis do we have for such processing?

In the case of patients' relatives, the data that may be processed is, in particular, **identification data**, i.e. your name, surname, data of birth and signature. Such processing of your personal data is carried out for the purpose of verifying your identity as well as for keeping records in medical documentation in connection with searching for such records and obtaining copies and extracts thereof, as well as for granting surrogate consent to the provision of certain medical services. In this scope, the personal data of legal and other representatives of patients is processed, as is the data of all other persons whom the patient has designated through expression of his/her will as persons with authorisation to obtain information on the patient's health condition. Processing of such data is necessary in order to fulfil the legal obligations of our organisation, where such statutory obligation is also a legal basis of processing.

In the event that the patient wishes that you be informed or contacted in the case of any event, we process your contact data, particularly your telephone number.

In connection with the provision of medical services, it can happen that we become aware of information other than that specified above. Such information can be provided to us by your relative, e.g. a family member, if we need to know, for example, his/her family medical history. If this involves retention of and access to such data, we will focus attention on the part of such information relating specifically to patients – your data will be handled in a similar manner.

In what form is my personal data processed?

We process your data in electronic and paper form. As your personal data is essential part of your relative's medical documentation, your data is administrated in a similar form.

To whom can we provide your personal data?

We administrate your personal data within our organisation, whereas we transfer such data to third parties with your consent as a matter of principle. In certain cases, however, we are forced to transfer your personal data to other recipients even without your consent.

In certain cases, we are legally authorised to further make your data accessible. This particularly refers to disclosure of your data to bodies of the state administration (e.g. social-security bodies, courts, etc.)

In order for us to provide you with high-quality care, in certain cases we also use external contractors, particularly if this involves technical support for our information system or administration of medical instruments that we use in the provision of medical care. Processing of any of your personal data may occur in connection with such activities. External contractors are in the position of processors and have a concluded written contract with us that binds them to comply with strict principles when handling your data. In such a case, your consent is not required for the purposes of carrying out processing activities, as such processing is directly allowed by a legal regulation. Please be aware that we select our contractors according to strict criteria and you thus need not be concerned about your data.

As a matter of principle, we do not transfer your personal data abroad. This may happen only exceptionally if you grant us consent for such transfer or if it is required by a legal regulation.

How long do we retain your personal data?

Your personal data is always retained for the absolutely necessary period. Due to the fact that, in the absolute majority of cases, we process your data in connection with the provision of medical care to your relative, it is necessary to retain such data for the period that the law requires for retention of his/her medical documentation. This period is stipulated by a regulation and amounts to 5-100 years or, as the case may be, ten years from the death of the patient depending on which part of the medical documentation this involves.

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 medical care is not possible without the processing of the personal data of patients and their relatives, some of your rights are limited by the law. As a relative of a patient, 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.

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.

If this involves provision of medical services, we process your personal data as set forth above, on the basis of the law in the absolute majority of cases. Therefore, this right essentially does not apply to you in the position of a relative of the patient.

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.uoou.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

If this involves cases in which your personal data is processed on the basis of consent, 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 a.s., Evropská 859/115, 160 00 Prague 6
- 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 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.