

# Information for pharmacy clients

## Introductory information

One of our activities is provision of health services consisting in the provision of pharmaceutical and clinical-pharmaceutical care whose purpose is mainly the procurement, storage, dispensing and sale of medicines under the Act on Pharmaceuticals. We very frequently dispense medications to you on the basis of a medical prescription, which we subsequently submit to health insurance companies for the purpose of provision of reimbursement. By means of a prescription, we may become familiar with your personal data and process such personal data. We carefully select all persons/entities that receive your personal data in connection with the performance of our activities, whether this refers to our employees or suppliers. All of our employees (from pharmacists to providers of cleaning services) are legally bound to strict confidentiality. We negotiate a confidentiality obligation with all of our contractual partners if there is a possibility that 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 personal data do we process?

Essentially, we process your personal data found on prescriptions for medications. This particularly refers to the following data, the scope of which is defined in a legal regulation:

- **identification data:** health-insurance provider code, name, surname, policyholder number, date of birth.
- **contact information:** contact address, your telephone number (if you consented to entry of your telephone number when the prescription was issued).
- **information on your health condition:** the prescribed medication and identification thereof, individual attributes of the medication, diagnosis for which the medication is prescribed.

## In what form is my personal data processed?

Your personal data is processed in both printed and electronic form. If this involves a prescription paid for in full by an insurance company, we are obligated to send the original prescription to the insurer and to retain a copy. If this involves a prescription for a medication that is not paid for by an insurance company, we retain the original of such prescription.

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

The purpose of processing your personal data is to ensure provision of healthcare services consisting in the dispensing of medications. Therefore, we process your personal data so that we can dispense the appropriate medications and, at the same time, so that we can receive reimbursement for such medications from the health insurance company of which you are a policyholder. The scope and obligation of personal data processing is governed by special acts by which we are bound. Our legal obligation is thus the legal basis for processing your personal data.

If you are a participant in our loyalty programme, we process your birth-registration number, the number of your loyalty card and your history of purchases or, as the case may be, dispensing of medications. We need such data in order to keep records of loyalty-programme members and to provide the promised discounts. Of course, we conduct the loyalty programme only with your express consent.

If we have interest in processing data for purposes other than those stated above, we will do so only on

the basis of your consent to such processing.

## 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.

First of all, in certain cases, we are obligated to transfer your personal data on the basis of the law. In particular, we transfer your data, including information on your health condition, to health-insurance companies in order to bill the medications that we provide to you.

In order to ensure the provision of high-quality care, 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 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 are 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 dispensing of medications, we retain your personal data for a period of five years as required by law.

If we process your data for a purpose other than dispensing medications or reimbursement for medications, i.e. particularly if we process your data on the basis of your consent, we undertake to process such data only for the period set forth in the consent.

## 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. Because, in a number of cases, the dispensing of medications is not possible without the processing of our personal data, some of your rights are limited by the law. At the same time, as a pharmacy client, you have an obligation to provide your data to us to a certain extent. Failure to provide your personal data could result in our inability to dispense medications to you and could thus be detrimental to your health. As a pharmacy client, however, 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 health services, we process your personal data as stated above, on the basis of the law in the absolute majority of cases. This right thus essentially does not apply to you in the position of a pharmacy client.

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### 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

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 the person who is responsible for protection of personal in the organisation 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](mailto: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.