

Information on the processing of patients' personal data

Dear clients,

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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) (hereinafter the “**General Regulation**”) we would like to inform you how we, the company **ISCARE a.s.**, registered office: Českomoravská 2510/19, Libeň, 190 00 Prague 9, Business ID 61858366; entered in the Commercial Register maintained by the Municipal Court in Prague, section B, entry 2703 as the personal data controller, (hereinafter the “**Controller**”), process your personal data and the rights and obligations associated with this.

This information is intended for our clients (patients) or potential clients.

1. What personal data do we process?

Personal data is any information about an identified or identifiable natural person (data subject). An identifiable natural person is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, a network identifier or to one or more specific elements of the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

We process the following categories of personal data:

- identification data that serve to uniquely and unmistakably identify you, such as name, surname, birth number, date of birth, permanent address, etc,
- contact details such as contact address, telephone number, email address, etc.,
- technical data, such as the time of the electronic communication and the IP address from which it was sent,
- other information, such as bank details, payment details, services requested,
- descriptive data, such as gender and appearance or data detectable from CCTV footage,
- special categories of data, such as health data, genetic data or data relating to the provision of health services and treatment in general.

2. Why do we process personal data?

We process your personal data:

- to provide you with the required health services under the health care contract and in negotiations to enter into that contract, or to provide you with benefits under another agreement with you, for example, for extra services,
- in the context of claims under the public health insurance system,
- because we are required by law as a provider of health services to record, store, transfer to specific institutions or persons or otherwise process certain personal data, or to fulfil our other legal obligations, e.g. in the field of accounting or taxation,
- to protect or exercise our rights or to enforce our legal claims,
- because of our interest in evaluating the quality of health services and client satisfaction through satisfaction questionnaires,
- for the specific purposes specified on the basis of your consent, if you give it to us in that case,
- to ensure cybersecurity in the case of information obtained from electronic communications,
- for the protection of our property and the protection of the life, health, property and personal data of our patients, employees and other persons on our premises and for the prevention of unwanted acts and

phenomena through CCTV; details of the processing of information through CCTV systems can be found in the document "**Information on the processing of personal data by CCTV systems**".

3. Where do we get personal data from?

We collect personal data:

- directly from you, in particular when providing health or other services and when dealing with complaints or other complaints,
- indirectly in the provision of health services, e.g. data obtained as results of laboratory or other tests,
- the processing and analysis of your previously collected personal data, e.g. in the context of an assessment of your health or the results of examinations carried out,
- from other healthcare providers, especially in the context of on-demand or follow-up healthcare,
- from specific institutions, e.g. health insurance companies or the e-Prescription system.

4. How do we process and protect personal data?

We process personal data to the extent necessary to fulfil the purposes described in point 2 above. Personal data are stored primarily in medical records in full compliance with applicable law. Their security and protection is ensured in accordance with these regulations and in accordance with the General Regulation.

Processing is done manually in paper and electronic form or automatically using computer technology, in compliance with all security principles for the administration and processing of personal data. For this purpose, we have taken technical and organisational measures, in particular to ensure that personal data cannot be subject to unauthorised or accidental access, alteration, destruction or loss, unauthorised transfer, unauthorised processing or other misuse of personal data. These measures are revised and updated as circumstances warrant. All persons/entities to whom personal data may be disclosed will respect Data Subjects' rights to the protection of privacy and are obligated to proceed in accordance with valid legal regulations on personal data protection.

5. How long do we process personal data?

We process personal data for the period of time necessary to fulfil the purpose for which they were collected, and in accordance with the time limits specified in the relevant legal regulations of the Czech Republic for the shredding and archiving of documents or, if no time limits are specified, for as long as the purpose for which we process them lasts or for the period specified in the consent to the processing of personal data.

After the expiry of the processing period, we will only process basic data about why we processed the personal data for a reasonable period of time for the purpose of demonstrating the lawfulness of such processing.

6. To whom do we transfer personal data?

The recipients of personal data may be, depending on the circumstances:

- other health service providers in the context of complementary or follow-up care and providers of requested health services, in particular external laboratories,
- institutions operating in the health system, especially health insurance companies,
- personal data processors to whom we have entrusted the performance of certain activities involving the handling of personal data, e.g. companies that manage electronic medical record systems, persons providing data storage or archiving, etc,
- persons providing legal, economic and tax advice or auditors, whose services we use primarily for the proper performance of legal obligations, the provision of services to clients and the protection of our rights,
- Government bodies as a part of the performance of statutory duties stipulated by the relevant legal regulations.

7. Informing you of your rights as a Data Subject

You have the right:

- a) to request access to the personal data we process. This means the right to obtain confirmation from us as to whether or not the personal data relating to you is being processed and, if it is, the right to obtain access to that personal data and to the other information regarding its processing referred to in Article 15 of the General Regulation.
- b) to request the rectification of personal data that are processed about you, if they are imprecise. With regard to the purposes of processing, in such cases you have the right to request the supplementation of incomplete personal data;
- c) to request the erasure of personal data in the cases provided for in Article 17 of the General Regulation, in particular if they are no longer necessary, you have withdrawn your consent, you object to the processing, we are obliged to erase them or they have been processed unlawfully.
- d) to request the restriction of data processing in the cases that are set out in Article 18 of the General Regulation; We will continue to store the limited processed data but will not otherwise handle it.
- e) to obtain personal data that concern you that we process automatically for the performance of a contract concluded with you, in a structured, ordinarily usable and machine-readable format, where you have the right to ask the Controller to hand over such data to another controller; under the conditions and with the restrictions stated in Article 20 of the General Regulation; and
- f) to object to processing within the meaning of Article 21 of the General Regulation on grounds relating to your particular situation, where we process such data in our legitimate interest.

If we obtain a request from you, we will inform you of measures adopted without undue delay and, in every case, within one month of receiving a request. This period can be extended by another two months, if needed and with regard to the complicated nature and number of requests. In certain cases set out in the General Regulation, we are not obliged to grant the request in whole or in part. This will be the case, in particular, if a request is evidently unjustified or unreasonable, in particular because it is a repeat request. In such cases we can (i) impose a reasonable fee taking into account the administrative costs related to the provision of the requested information or statements or for taking the requested actions or (ii) refuse to comply with a request.

If we receive such request, but have reasonable doubts about the applicant's identity, we can ask him/her to provide additional information necessary to confirm his/her identity.

You also have the right to address your complaint to the Office for Personal Data Protection, <https://www.uoou.cz> if you believe that we are not processing your personal data in accordance with the law. You also have the right to apply to a competent court if you consider that your rights have been infringed by the processing of your personal data.

We would also like to inform you that our company has appointed a Personal Data Protection Officer. Contact details for the officer: e-mail: dpo@akdap.cz.

In conclusion, once you have entered into a health care contract, the provision of personal data by you is necessary for the provision of the requested health care services and also for the performance of our legal obligations, and it is your responsibility to provide personal data, just as the health care professional has the right to request the necessary personal data. Failure to provide information may mean that we are unable to provide you with health services, which could result in harm to your health or a direct threat to your life.