

## Information on the processing of personal data by MEDIRECO CLINIC S.r.O.

### What are the key terms related to the processing of personal data?

- **Personal data** – any information relating to an identified or identifiable natural person, such as a first name, surname, date of birth, national identification number, phone number, e-mail address, IP address, etc.
- **Data subject** – the person to whom the personal data relate
- **Processing of personal data** – the activity that the controller or processor carries out with personal data
- **Controller** – the person who determines the purpose and means of processing personal data
- **Processor** – a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller on the basis of the controller's authorisation
- **purpose** - the reason for which the controller processes personal data
- **Special categories of personal data** – this constitutes special category personal data, such as data concerning health
- **Legitimate interest** – the legitimate interest of the data controller or of another entity, including interests of the data controller laid down by legal regulations, for example the protection of property through the use of a camera system
- **Recipient** – a person to whom personal data are disclosed

### Who is the data controller?

MEDIRECO CLINIC s.r.o. (hereinafter "the Controller") Business ID: 250 57 065 with its registered office: Blanická 553/16, Postal Code 12000, Praha 2.

Data Protection Officer: Jiří Benedikt. You may contact the Data Protection Officer at the e-mail address": [poverenec@medireco.cz](mailto:poverenec@medireco.cz) or by post at the following address: Medireco, a.s., V Jámě 699/5, 110 00 Praha - Nové Město.

### What personal data do we process?

- basic identification data
- contact details
- personal data collected for the purpose of providing healthcare services, which fall within the special categories of personal data

### For what purposes and for how long do we process personal data? Processing based on compliance with a legal obligation

Providing your personal data to the Data Controller for the purpose of delivering healthcare services is a legal requirement under Act No. 372/2011 Sb., on Health Services and the Conditions for Their Provision, and other legal regulations. The processing of personal data for this purpose is necessary for the performance of the legal obligations of the Data Controller. Failure to provide your personal data may mean that the Data Controller will not be able to provide you with healthcare services. These personal data are stored in accordance with the applicable legal regulations, in particular Decree No. 98/2012 Sb., on Medical Documentation, as amended.

### Processing on the basis of a contract

In the case of a contractual relationship, we process personal data for the purposes of your contract, in particular when negotiating the conclusion, amendment or administration of your contract. In this case, personal data are processed only to the extent necessary for the conclusion and performance of the contract. For this purpose, the provision of your personal data is completely voluntary, but is necessary for the conclusion of the contract and its subsequent administration. Without this information, we would not be able to conclude a contract with you or fulfil

the rights and obligations arising from it. We retain these personal data for as long as necessary to ensure the mutual rights and obligations arising from the contract.

### **Processing on the basis of legitimate interests**

We also process certain data for our internal purposes, which may include the protection of our rights and legitimate interests. This may involve, for example, monitoring the reception area with a camera system (see below) or using the contact details of our clients and patients for purposes related to the provision of our services. These personal data, like all others, are retained only for as long as necessary in relation to the purpose for which they are processed.

### **Processing based on the data subject's consent**

In certain cases, such as processing personal data for the purpose of publishing photographs on our website or Facebook, we have requested your consent for such processing. The specific purposes, as well as your rights and obligations, are always set out in the relevant form. These personal data are processed for the period for which consent has been given, or until such consent is withdrawn.

### **Who are the potential recipients or categories of recipients of personal data?**

- the patient, the patient's legal representative or guardian, persons designated by the patient, legal representative, or guardian, foster carers, or other caregivers
- other healthcare or social service providers, to ensure continuity of additional healthcare and social services provided to the patient
- persons authorised to access medical records under Section 65 of Act No. 372/2011 Sb.
- public authorities (in particular, law enforcement authorities, the Police of the Czech Republic, public prosecutors, courts) and other entities based on other legal regulations
- entities that provide services to the Data Controller and with whom the Data Controller has concluded an appropriate data processing agreement, such as providers of our IT services

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

- you have the right to request information on what personal data the Data Controller processes about you
- you have the right to request access from the Data Controller to personal data concerning you as a data subject
- you have the right to request their correction or deletion (where deletion is permitted by legal regulations)
- you have the right to restrict processing
- you have the right to object to processing (only for the purpose of the legitimate interests of the Data Controller – see point 4.)
- you have the right to contact the Data Protection Officer of the Data Controller in all matters relating to the processing of your personal data and the exercise of your rights under the relevant legislation
- If you have provided personal data to the Data Controller on the basis of consent, you have the right:
  - to obtain personal data relating to you in a structured, commonly used and machine-readable format and the right to disclose that data to another data controller,
  - for personal data to be transmitted directly from one data controller to another, where technically feasible.
- you have the right to submit a complaint with the supervisory authority if you believe that the processing of your personal data infringes your rights or breaches the obligations of the Data Controller. You may submit a complaint to the relevant supervisory authority, which is the Office for Personal Data Protection
- If you have any questions about the processing of your personal data, or if you wish to exercise the above rights, you can contact us at the following e-mail address: [poverenec@medireco.cz](mailto:poverenec@medireco.cz)

### **Information on the processing of personal data through a camera system**

## Description of the camera system

The camera system is an automatically operated, permanent technical system that allows for the recording and storage of images from monitored areas. The source of personal data is the video recordings (recordings from the camera system) retained for a certain period. The cameras are fixed in position and have night vision capabilities. They capture colour images, and the quality of the recordings is sufficient to identify individuals and recognise their activities. The camera system operates continuously, 24 hours a day, with all cameras recording non-stop without audio tracks. Recordings from the cameras are continuously stored on the Data Controller's on-site data storage. Both the data transfer and storage are appropriately secured.

### Record storage period

The record storage period is set at 14 days. After this period, the recordings are automatically overwritten.

### Location of individual cameras

- on the exterior of the building, covering the stairs in front of the entrance
- on the exterior of the building, covering the entrance to the building
- on the ceiling of the main corridor next to the reception on the ground floor, in the right-hand corner, covering the stairs and corridor
- on the ceiling of the reception on the ground floor, in the right-hand corner, covering the reception area
- on the ceiling of the gynaecological waiting room in the right corner of the room, covering the waiting room and the entrance door
- on the ceiling of the waiting room of the ENT and eye clinic, in the left corner of the room, covering the waiting room and the entrance door
- on the ceiling of the waiting room of the cardiology, internal medicine and orthopaedic outpatient clinic, in the left corner of the room, covering the waiting room and the entrance door
- on the ceiling of the waiting room of the endocrinology, diabetes, internal medicine and psychiatry outpatient clinics, in the left corner of the room, covering the waiting room and the entrance door
- on the ceiling of the waiting room of the neurology and skin outpatient clinics, in the right corner of the room, covering the waiting room and the entrance door
- on the ceiling of the staircase in the left-hand corner, covering the staircase and the entrance door, on the ceiling of the corridor leading to the lift in the top left-hand corner, covering the corridor leading to the lift and the lift door

### Purpose of processing

The purpose of processing is to protect the Data Controller's property and the property of individuals present on the Data Controller's premises, as well as to ensure the safety of these individuals.

### Legal basis for processing

Personal data are processed without the consent of the data subjects on the basis of the legitimate interest of the data controller pursuant to Article 6(1)(f) of the Regulation. The legitimate interest here is the protection of property and persons.

### Personal data subjects and categories of personal data

The data subjects whose personal data are processed by the Data Controller are primarily patients and employees of the Data Controller, as well as other individuals entering the premises for any other reason. The data processed from the camera system consist of recordings, which may be used to identify individuals in connection with the purpose of processing. The scope of the processed data is limited solely to recording individuals in certain clearly defined locations. The Data Controller will not process data relating to address or identification data, sensitive data, or descriptive data.

### Disclosure of records outside the Data Controller

Under certain circumstances, in addition to the Data Controller and the Processor, the recipients of the recordings may also include law enforcement authorities (the Police of the Czech Republic, public prosecutors), courts, or other public administration or local government authorities dealing with offences in accordance with legally established rules.

### **Rights of the data subject**

- you have the right to request information on what personal data the Data Controller processes about you
- you have the right to request access from the Data Controller to personal data concerning you as a data subject
- you have the right to request correction, restriction, or deletion of your personal data (where deletion is permitted by law)
- you have the right to raise an objection to the processing
- you have the right to contact the Data Protection Officer of the Data Controller in all matters relating to the processing of your personal data and the exercise of your rights under the relevant legislation
- you have the right to submit a complaint with the supervisory authority if you believe that the processing of your personal data infringes your rights or breaches the obligations of the Data Controller. You may submit a complaint to the relevant supervisory authority, which is the Office for Personal Data Protection.

### **Information on the use of cookies**

We would like to inform you that we use cookies on our website: [www.medirecoclinic.cz](http://www.medirecoclinic.cz). Cookies help you find exactly what you're looking for.

### **What are cookies?**

Cookies are small text files created by a web server and stored on your computer through your browser. When you return to the same website later, your browser sends the stored cookies back, allowing the server to access the information it previously saved. The vast majority of websites use cookies to operate correctly and ensure proper functionality. These files are stored in your browser, and no one else can access them.

### **What cookies do we use and why?**

Cookies on our website can be categorised by purpose or by duration. By duration, cookies can be divided into short-term and long-term cookies:

- short-term cookies are valid for the duration of your visit to the website and are deleted from your computer a few minutes after you leave the site
- long term cookies are retained after you close your browser, they are only deleted after a very long period of time (this depends on your browser and cookie settings). You can also remove them manually

Depending on their purpose, cookies can be divided into essential, analytical, remarketing and conversion cookies:

- essential (functional) cookies – short-term cookies that ensure the basic technical functionality of the website, such as logging in, using its services, etc.
- analytical cookies – long-term cookies used to generate anonymous statistics about website usage (e.g., Google Analytics, Google Tag Manager)
- remarketing cookies – long-term cookies that help target patients with advertising on other websites
- Conversion cookies - long term cookies, used to evaluate how advertising works and the different ways users reach the Medireco Clinic website

Cookies never store sensitive or personal data.

### **Disabling the storage of cookies**



Common internet browsers allow you to disable cookies in their settings. You can also delete any cookies already stored on your computer at any time. Check your browser's help section for guidance and follow the instructions. Keep in mind that disabling cookies may significantly limit the functionality of this website.

You can find instructions for disabling cookies on the website of your browser provider:

- Chrome
- Firefox
- Internet Explorer
- Android

For more information about cookies and their use, please visit [AboutCookies.org](https://www.aboutcookies.org).

If you have any questions about the processing of your personal data, or if you wish to exercise the above rights, you can contact us at [poverenec@medireco.cz](mailto:poverenec@medireco.cz).