

## 1. PROCESSING OF PERSONAL DATA BY THE CONTROLLER:

### 1.1 Personal data processed by:

**Business corporation ReproGenesis a.s., id. reg. no.: 24749877, Reg. no.: B 6389 maintained by the Regional Court in Brno, with registered office at Hlinky 60/144, Pisárky, 603 00 Brno (the “Controller“)**

to the extent that they have been provided by the data subject in connection with the conclusion of a health care contract with the controller or in connection with the provision of health services in accordance with Act No 372/2011 Coll., on Health Services and Conditions of their Provision (Health Services Act), its implementing regulations and other regulations governing the provision of health services. The controller shall also process personal data which have not been provided to it by the data subject but which it obtains while providing health services, e.g. data obtained as results of specific examinations and medical operations.

- 1.2 The controller collects, stores and uses personal data in accordance with Act No 110/2019 Coll. on personal data processing (hereinafter referred to as the Act on the processing of personal data), or 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/ES (the “Regulation“). The individual purposes for which the administrator processes personal data are defined below. The administrator collects these data also via its website <http://reprogenesis.com> (hereinafter referred to as the “website“).
- 1.3 The personal data controller declares that all personal data processed by the controller are strictly confidential. The controller handles them in accordance with national and European Union legislation applicable in the field of personal data protection.
- 1.4 This policy is issued by the controller to ensure that the data subject is properly informed about what personal data the controller processes, for what purpose, for how long, who will have access to your personal data and what your rights are.
- 1.5 This policy applies to all personal data collected by the controller, whether collected for the purpose of fulfilling a contractual relationship, legal obligation, legitimate interest or given consent.

## 2. PERSONAL DATA HANDLING POLICY

- 2.1 In handling personal data, the employer, his employees, and others are governed by this policy:
  - a) handle personal data in accordance with legal regulations.
  - b) handle personal data judiciously, do not abuse consent to the processing of personal data.
  - c) process personal data for the purpose and to the extent specified and ensure that it is true and accurate.
  - d) process personal data in accordance with the principle of lawfulness – on the basis of legal regulations, in the performance of a contract, in the performance of the legal obligation of the controller, in the protection of the vital interests of the data subject or

another natural person, in the protection of legitimate interests of the employer, in the protection of the public interest, and the processing of personal data on the basis of consent,

- e) respect the rights of the data subject, in particular the rights to give and withdraw consent to processing, the right to erasure, to object to the extent of processing, etc.
- f) provide a special protection for children in processing personal data.
- g) provide information on the processing personal data, communicate.
- h) consider the obligation to protect personal data against misuse when entering contracts and legal transactions.

### **3. PROCESSED DATA**

3.1 The controller is authorised to process following personal data.

### **4. PURPOSE OF PROCESSING OF PERSONAL DATA:**

- a) the provision of health services and the consequent fulfilment of legal obligations by the controller.
- b) the purpose resulting from the negotiation of the contemplated contractual relationship for the purpose of entering a health care contract, and similarly.
- c) the purpose resulting from the performance of a health care contract between the patient and the controller; means the relationship between the data subject and the controller arising from an order, registration, concluded contract.
- d) the maintenance of medical records.
- e) the establishment, exercise, or defence of legal claims.
- f) the protection of company property and the protection of life, health, property and personal data of patients, employees and other persons moving on the premises of the controller and prevention of undesirable acts and phenomena through camera system.
- g) the evaluation of the quality of health services and sending out satisfaction questionnaires (legitimate interest of the controller).
- h) accounting and tax purposes, i.e. accounting records within the meaning of accounting and tax legislation; provision to the extent necessary for legal, economic and tax advisers and auditors to provide advisory services to the controller.
- i) display advertising means: the display of advertisements on a website based on statistically determined customer preferences.
- j) the legitimate interest of the controller, e.g. for the defence in the event of a dispute; the period of processing of personal data in such a case is 4 years from the expiry of the warranty period for the goods and is extended by the period for which the dispute is pending. We want to continuously improve our services and, where appropriate, provide new and better services; we want to avoid obstructing such activities; therefore, activities that contribute to this objective are our legitimate interest. Processing for fraud prevention purposes (e.g. assessing the risk of entering a contract), direct marketing (e.g. offering relevant services to existing customers), transfer of personal data within the group of companies for internal administrative purposes, notification of criminal offences and

transmission of personal data to the competent authority, ensuring network and information security are also legitimate interests. This list is only indicative.

- k) fulfilling other legal obligations means: providing information to law enforcement authorities, providing information to other public authorities, etc.

## **5. SOURCES OF PERSONAL DATA**

5.1 The controller processes personal data received:

- a) in connection with the provision of health services within the meaning of Act no. 372/2011 Coll., on health services and conditions of their provision, and Act no. 373/2011 Coll., on specific health services.
- b) directly from the data subjects in connection with the handling of complaints.

## **6. CATEGORIES OF PERSONAL DATA AND CATEGORIES OF DATA SUBJECT**

6.1 The following categories of personal data of data subject are subject to processing:

- a) name and surname
- b) contact address
- c) phone number
- d) e-mail address
- e) identity document type and number
- f) date of birth
- g) bank connection
- h) other data necessary for the performance of the health care contract, in particular data on the health status of the data subject
- i) health insurance number
- j) photos of the data subject
- k) camera footage from the establishment

6.2 The data subjects, whose data are processed by the personal data controller and to whom this information is addressed are:

- a) the patient
- b) the applicant for a health care contract
- c) the applicant for the provision of health services

## **7. PROCESSING AND PROTECTION OF PERSONAL DATA**

7.1 The personal data are processed primarily in the medical records in full compliance with applicable law, especially in medical records. Their security and protection is ensured in accordance with these regulations and the General Regulation.

7.2 The processing is carried out manually in paper and electronic form or automated by computer technology, in compliance with all security principles for the management and processing of personal data. That is why appropriate technical and organisational measures have been taken by the controller, to ensure that personal data cannot be subject to

unauthorised or accidental access, alteration, destruction or loss, unauthorised transmission, unauthorised processing, and other misuse of such personal data. All subjects to which personal data may be disclosed shall respect the right of data subjects to privacy and shall comply with applicable laws governing the protection of personal data.

## **8. PERIOD OF PROCESSING OF PERSONAL DATA**

8.1 The controller processes personal data for the period necessary to fulfil the purpose and in accordance with the time limits specified in the relevant generally binding legal regulations of Czech Republic for the shredding and archiving of documents, or as long as necessary for the establishment, execution or defence of legal claims and in accordance with the legal requirements within the meaning of Decree No. 98/2012 Coll., on medical documentation, which specifies the period for which it is necessary to keep the patient's medical records.

## **9. CATEGORIES OF PERSONAL DATA PROCESSORS**

9.1 The processors and recipients of personal data of the subjects are in particular:

- a) other providers of allied health services and providers of selected health services, in particular laboratories.
- b) companies that manage electronic medical record keeping systems, persons providing data storage or archiving and others.
- c) persons providing legal advice.
- d) public authorities in the performance of their statutory duties under the relevant legislation.
- e) health insurances.
- f) other processors who process personal data of the subject for the controller based on a personal data processing contract concluded with the controller to the extent necessary for the purpose of the processing.

## **10. PERSONAL DATA PROCESSED ON THE BASIS OF A CONSENT**

10.1 The processing of personal data beyond the scope of the law (including legitimate interest, performance of a legal obligation, performance of a contract, public interest) requires the consent of the person whose personal data is being processed. Consent must be instructed, informed and specific, preferably in writing. Consent is obtained only for specific data (e.g. specified by type), for a specific period of time and for a specific purpose.

10.2 Where the controller has obtained consent from the data subject for the processing of personal data, this is for one of the purposes specified for each such consent.

## **11. RIGHTS OF THE DATA SUBJECT**

11.1 As a data subject, you have the following rights under the law, which you can exercise at any time. These are:

- a) the right of access to personal data, under which you have the right to obtain information from the controller about whether the controller processes your personal data. The controller is obliged to provide you with this information without undue delay. The content of the information is determined by Article 15 of the GDPR. The controller has the right to charge a reasonable fee for providing the information, not exceeding the costs necessary to provide the information.

- b) the right to rectification or erasure of personal data or restriction of processing, whereby you have the right to have personal data that is inaccurate or incorrect rectified. If your personal data is no longer necessary for the purposes for which it was collected or is being processed unlawfully, you have the right to request its erasure. If you do not want to request the erasure of personal data, but only to temporarily restrict its processing, you can request the restriction of processing.
- c) the right to request an explanation if you suspect that the processing of personal data by the controller is in breach of the law.
- d) the right to contact the Office for Personal Data Protection, located at Pplk. Sochora 727/27, 170 00 Prague 7 - Holešovice, in case of doubts about compliance with the obligations related to the processing of personal data; including the right to file a complaint with this office.
- e) the right to data portability, i.e. the right to obtain personal data concerning you that you have provided to the controller in a structured, commonly used and machine-readable format, see Article 20 GDPR for more details.
- f) the right to object to the processing of personal data processed for the performance of a task carried out in the public interest or in the exercise of official authority or for the protection of the legitimate interests of the controller. The controller shall terminate the processing without undue delay unless it demonstrates that there is a legitimate interest/reason for the processing which overrides your interests, rights, or freedoms.
- g) the right to withdraw consent to the processing of personal data at any time if you have given your consent to the controller to process your personal data.
- h) the right to the portability of the data to another controller.

## **12. TRANSFER TO THIRD COUNTRIES**

12.1 The personal data may be transferred to third countries both within and outside the EU.

In Brno, the 14 March 2024

ReproGenesis a.s.