

# INFORMATION FOR PATIENTS ON THE PROCESSING OF PERSONAL DATA

following 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/EC (General Data Protection Regulation or "GDPR")

## I. Controller of personal data

### **MUDr. Youngová & spol., s.r.o.**

with its registered office at Vítězné náměstí 829/10, Bubeneč, 160 00 Prague 6  
a company registered in the Commercial Register of the Municipal Court in Prague,  
under file no. C 165343  
("the Company")

The Controller is a provider of health services in accordance with Act No. 372/2011 Coll., on health services and conditions of their provision, as amended ("the Act").

## II. Purposes of processing of personal data

We process your personal data for the purpose of

- provision of health services, including the use of an electronic appointment system that sends reminders of appointment times to patients by email and/or text (SMS) message
- reporting of medical services provided under contract to public health insurance companies
- billing medical services not provided under contract to public health insurance companies
- communication of information about your health to you and other authorised persons
- organisation of the provision of health services (for instance, making appointments for patients)
- keeping records of our revenues and expenditures, payments received and accounts, as set out in regulations governing tax and accounting
- the obligations of the contract to provide the services of the Company (if any) in the sense of the *General Conditions for the Package of Additional Services provided by the general practice MUDr. Youngová & spol., s.r.o.*
- proper communication with patients (e.g. sending of invitations to preventive examinations)
- communication with other physicians (e.g. specialists to whom we have referred the patient or specialists whom the patient visits without a referral from us)
- communication with persons close to the patient (if necessary or advisable, and if we have authority to do so)
- verification of the quality of our services and of patient satisfaction
- sending communications relating to new services provided by the Company or changes in the Company's operations (e.g. about opening hours, temporary closure, cooperation with new specialists etc.)
- procuring a video record from the camera system in the waiting room, to ensure the safety of persons and the protection of the Company's assets there.

## III. Legal grounds for processing of personal data

The legal basis for the processing of your personal data referred to in section II. above is

- to fulfil our statutory obligations (particularly under Act No. 372/2011 Coll., on health services and conditions of their provision, Act No. 48/1997 Coll., on Public Health Insurance, Act No. 563/1991 Coll., on Accounting, Act No. 586/1992 Coll., on Income Tax, and Act No. 634/1992 on Consumer Protection); and
- to fulfil our obligations from the contract on health care, based on which we provide you with health services (this contract is not necessarily concluded in writing); and
- where processing is necessary to protect the legitimate interests of the Company.

We process personal data in accordance with Article 6 of the GDPR.

## IV. Recipients of personal data and security of personal data

The recipients of your personal data may, in accordance with the relevant legal provisions, be: another provider of health services, public authorities and persons authorised to inspect medical documentation pursuant to articles 31, 32, 33 and 65 of the Act. In addition to processing by the Controller, personal data may also be provided to other processors for the purposes set out above, and for backup, patient communication (via the Emmy application from the company Emmy Medical s.r.o., SMS, telephone and email), and also for its billing system. With these additional processors, the Company has signed a contract governing processing in

accordance in particular with Article 28 of the GDPR. Some of these processors may process your personal data in other EU countries.

Personal data are kept in paper form in files and archives which are locked when personnel of the Company are not present. Locked archives are also kept outside the practice. Personal data stored electronically are electronically secured.

#### **V. Duration of processing of personal data**

Personal data contained in medical records are processed for the period stipulated by Decree No. 98/2012 Coll., on Medical Records. Personal data processed for other purposes mentioned in section II. are processed for a period of one year after you cease to be our patient in the sense of registration with another general practitioner in the Czech Republic, unless a longer period is specified by law. We keep information on your requests and appointments for a period of five (5) years. We keep video records from our camera system for a period of seven (7) days.

#### **VI. The rights of the data subject**

In the processing of your personal data, you have the following rights:

- the right to require us to give you access to your personal data;
- the right to correct the personal data that we process;
- the right to limit the extent of processing. Restriction of processing means we must label those personal data, for which processing is limited to processing, and for the duration of the restriction they must not be further processed with the exception of their storage. You have a right to limit processing if
  - you contest the accuracy of the personal data, and you may limit processing for the time required to enable us to verify the accuracy of personal data;
  - the processing is unlawful and instead of the erasure of your personal data you ask instead to limit their use;
  - if you do not need your personal data any more for purposes of processing, but you wish to determine, exercise or defend legal claims;
  - if you have raised a complaint against the processing, as set out below in section VII., until it is verified that our legitimate grounds for processing outweigh your interests or rights and freedoms;
- the right to erasure of personal data. The right of erasure of personal data applies only to personal data processed for purposes other than the provision of health services. The data that we hold on you to provide health services (e.g. in your medical records), we cannot erase;
- the right to data portability. You may ask us to provide your personal information for transmission to another personal data controller, or that we ourselves hand your personal data to another controller. This right, however, you have only in respect of those data that are processed automatically based on your consent or our contract with you. The data that we hold on you to provide health services (e.g. in your medical records), we may only give you to you and to other medical service providers or public authorities, as provided by law;
- the right to file a complaint with the supervisory authority, in the event that you believe that our processing of personal data is in violation of legislation on the protection of personal data. You may file a complaint with the supervisory authority in your place of habitual residence, place of work or in the place where the alleged violation occurred. In the Czech Republic the supervisory authority is the Office for Personal Data Protection, Pplk. Sochor 27, 170 00 Praha 7, [www.uoou.cz](http://www.uoou.cz).

#### **VII. The right to object to processing**

In case we process your personal data for the purposes of the legitimate interests of ourselves or someone else (the legal bases of processing are listed in section III), you always have the right to raise an objection against such processing. You can raise an objection at our address listed in section I. If you raise such an objection, we will be entitled to continue such processing only if we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

#### **VIII. Mandatory processing and the obligation to provide personal information**

Processing of your personal data for the purpose of providing medical services is a legal requirement. Failure to provide your personal data may mean that we will not be able to provide you with health services, which may damage your health or directly threaten your life (Article 41 paragraph 1 point. d) of Act No. 372/2011 Coll., on health services and conditions for their provision). The obligation to provide personal data of the patient applies also to his/her legal representative or guardian (Article 41 paragraph 2 of the Act).