

PERSONAL DATA PROTECTION STATEMENT

Introductory provisions, copyright

The owner and operator of the website www.incare.cz is the company **MEDICON InCare s.r.o.**, Company Identification Number: 241 99 605, with its registered office at Antala Staška 1670/80, Prague 4, 140 00, entered in the Commercial Register kept by the Municipal Court in Prague, file No. C 187964 (hereinafter referred to as the "**Company**").

The Company owns the copyrights to all content that the Company places on the website www.incare.cz (hereinafter referred to as the "**Website**").

Links to other websites

The Website contains links to other websites over which the Company has no control. Therefore, this statement does not apply to links that redirect users from the Website and link to information and services of external entities. The Company does not hold any responsibility for the contents and procedures used by the operator of such websites.

Information on the processing of personal data

What is personal data?

Personal data, in accordance with 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, hereinafter "the Regulation"), means all information on identified or identifiable natural person (hereinafter referred to as "data subject"); an identifiable natural person is a natural person who can be identified directly or indirectly, in particular by reference to a specific identifier, such a name, identification number, location data, network identifier and one or more specific traits of physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

Depending on the specific situation, personal data may include, but is not limited to, the name and surname, address, telephone number or e-mail address of the individual (natural person). Personal data does not include information such as the number of users of the website.

Health status related data treated by the Company is considered to be particularly sensitive data, the so-called special category of personal data and is subject to stricter rules.

Compliance with personal data protection legislation

As a personal data administrator, the Company processes certain personal data of its patients/clients, Website users, job seekers, suppliers/customers and their representatives, its employees and visitors to its premises. As a personal data administrator, the Company determines the purposes and means of personal data processing and sets out measures related to the processing of personal data, in particular their security. When processing personal data, the Company proceeds in strict accordance with the relevant legal regulations, in particular the Regulation and Act No. 372/2011 Coll. on health services and conditions for their provision, as amended.

Data subjects and purposes of personal data processing

Patients/clients

The company processes personal data of patients/clients in order to fulfill its legal obligations in connection with the provision of health and social services and in the extent as specified by law. In particular, the Company prepares reports for health insurance companies and relevant public authorities and keeps medical records.

Patients/clients are obliged by valid legal regulations to provide the Company with personal data necessary in connection with the provision of health and social services. Failure to do so would prevent the Company from fulfilling its obligations under applicable law and, in most cases, from providing health and social services.

The company is aware of the sensitivity of patients'/clients' personal data, especially data on their health status, and fulfills the obligations to protect personal data, as resulting from the relevant legislation. Protection is provided for personal data stored in the Company's information systems (e.g. through encryption, control over access to the information systems and logging of user activities in information systems) as well as for personal data in paper documentation (e.g. by placing medical documentation in lockable cabinets or lockable spaces).

Personal data of patients/clients processed due to the fulfillment of a legal obligation are processed by the Company only for the necessary period. However, the Company is obliged to keep this personal data for a longer period of time, that is for the period specified by the relevant legal regulations.

In addition to fulfilling the legal obligation, personal data of patients/clients are processed only with their consent and for the purposes stated in the consent.

Website Users

Based on its legitimate interest, the Company processes the following personal and other data of users of its Website.

Contact form

When a user of the Website initiates a contact with the Company by filling in the contact form on the Website, the provided data (including contact details) will be processed in order to answer inquiries and the subsequent questions.

The Company will keep this personal data only for the time necessary to resolve the inquiry and also for the time period during which, on the basis of the above-mentioned inquiry and the applicable response of the Company, a legal claim may be raised against the Company (i.e. until the limitation period that applies to bring a claim, typically three years).

Personal data processed when visiting the Website

When visiting the Website, the Company stores the abbreviated IP address of the user's computer and information about the website from which the entry was made. During the visit, information about the date and time of access, names of accessed files, URL, HTTP response code, access status and information about the amount of data transferred within the connection are stored. The Company uses this data exclusively for statistical purposes.

The Company uses Google Analytics from Google LLC, located at 1600 Amphitheater Parkway, Mountain View, CA 94043, United States, to analyze Website traffic.

Cookies

The Company uses cookies on the Website, i.e. data information that allows each user's browser to communicate with the Company's server and thus create an individual connection between each user's computer and the Company's computer. Cookies generally help to browse web pages more quickly efficiently, and tailor the display of content to the individual interests and specific needs of the user. Cookies are used to compile anonymous aggregate statistics that allow us to understand how users use the Website, in order to optimize its structure and content, as well as to provide certain functions of the Website. The information obtained through the use of cookies is collected only for the purpose of mediating and performing certain user functions.

The Company mainly uses a "relational" type of cookies, i.e. cookies that are temporary and remain stored in the user's device only until they log out of the Website or close the web browser (afterwards they are removed from the user's browser).

Generally speaking, the application used to view web pages allows cookies to be stored on the user's device by default. This mode can be modified either by completely blocking the cookies in the web browser settings, or by partially restricting them - the user is then informed every time his device stores cookies. More detailed information about the options and ways of handling cookies are available in the application settings (web browser). However, in the case of complete blocking of cookies, it is possible that the user's content will not be displayed optimally when browsing the Website, especially when using online services.

When visiting the Website for the first time, the user is notified of the use of cookies via a so-called cookie banner and is asked to give his consent to their use.

Server-log-files

The Company automatically collects and stores information in the so-called server-log-files, which are transmitted to the Company by the user's Internet browser. These data include:

- Type of internet browser and its version;
- Operating system;
- Referring URL;
- IP address;
- Hostname of the accessing computer;
- Server request time.

The Company reserves the right to retrospectively check this data in case of suspicion of illegal user behavior.

Google Maps

The site uses the Google Maps API to visually display geographic information. When using Google Maps, Google LLC, located at 1600 Amphitheater Parkway, Mountain View, 94043 California, processes user data from the Website using Google Maps features. For more information on the processing of data by Google Inc. users can view Google Inc.'s privacy policy. (<https://policies.google.com/privacy?hl=cs>).

Suppliers/customers and their representatives

The company processes personal data of suppliers/customers and their representatives (natural persons) to the extent necessary for the negotiation of the contract and the performance of the contract which it concludes with the relevant persons for the purpose of providing services or purchasing products and services. In addition to the data necessary for the performance of the contract, the Company processes other personal data of suppliers/customers and their representatives only on the basis of duly granted consent. The Company obtains processed personal data directly from these data subjects or from public sources.

Job seekers

In order to organize and evaluate the selection process for the recruitment of new employees, the Company processes the personal data of job seekers. The company obtains processed personal data directly from these data subjects.

The legal reason for processing personal data in this case is the selection procedure (or negotiations on the conclusion of an employment contract following the applicant's application to participate in the selection procedure), beyond the scope of a specific selection procedure, the personal data of the applicant are processed only with his/her consent.

Employees

The company processes personal data of employees to the extent necessary for the fulfillment of its legal obligations (e.g. the obligation to deduct or pay taxes, keep records for the purposes of health insurance and social security, etc.). The employee is obliged to provide this information to the Company; failure to do so would constitute a breach of law on the part of the employee and/or the Company and the possibility of sanctions being imposed by the competent authorities.

As part of fulfilling legal obligations, the Company processes personal data of employees for the purpose of promoting its legitimate interests or fulfilling the contract concluded between the Company and the employee, especially for the purpose of maintaining a database of Company employees, providing contact details of certain employees on the Website, informing about company events, protection of the Company's property or ensuring the entry of authorized persons into the Company's premises.

In other cases, the Company processes personal data only with the consent of employees, and employees can freely decide whether or not to grant their consent. The Company will not sanction the decision not to grant such consent.

Visitors to the Company's premises

The company has installed CCTV systems in some areas. These camera systems process personal data (especially video recordings of visitors' faces) due to the legitimate interest of the Company in order to protect the Company's assets.

The cameras are placed in a way that protects the privacy of the monitored persons as much as possible. Thus, only parts of the Company's premises are monitored, where criminal activity can most likely be expected to be committed (waiting rooms, corridors, etc.), private premises (changing rooms, toilets, etc.) are not monitored.

To minimize the impact on data subjects and to ensure the compliance of the processing of personal data with the Regulation, the Company has implemented the following measures:

- camera recordings are kept only for a short time period, after which they are overwritten with new recordings;
- data subjects are informed about the processing of data via information signs and on the Company's website;
- access to camera recordings is restricted to authorized Company employees only;
- a computer meeting the Company's security standards is used in any case for interventions in the camera system (downloading of records, changes of configurations) (e.g. installation of an anti-virus program, protection of access with a regularly changed password, etc.);
- Company employees authorized to access camera recordings are bound to confidentiality and their obligations in the field of personal data protection are continuously enforced;
- physical protection against interference with the camera system is introduced, including in particular:
 - placement of the cameras at a height outside the normal reach of people moving in the premises;
 - supervision by the Company's employees and in some cases also by the safety services;
 - physical security (locking and use of other security features) of the premises outside opening hours;
 - regular inspections of the actual condition of the cameras.

Recipients of personal data

The company provides the processed personal data only to its partners who have implemented appropriate technical and organizational measures for data protection and fulfillment of other obligations under the Regulation. The Company's partners have access to personal data only to the extent necessary to perform their tasks.

In particular, the Company provides personal data of patients/clients to other health care providers (clinics and other outpatient facilities, assisted reproduction centers, inpatient departments, imaging departments) in order to ensure continuity of health care and to the health insurance companies and government agencies in cases provided by law. Personal data may also be accessed by certain contractual partners of the Company providing the Company's information systems and, in some cases, also by companies providing employee benefits, preparation of statements, payroll and accounting for the Company. Personal data of employees and job seekers are also in some cases shared with other Medicon Group companies.

The complete list of recipients of personal data is available at: www.mediconas.cz.

In no case does the company provide personal data to other persons for a fee.

Transfer of personal data abroad

The company does not commonly transfer personal data outside the European Union. The transfer of personal data to other countries does not affect the legal status of data subjects.

In exceptional cases (e.g. in clinical trials), personal data may be transferred outside the European Union (to the so-called third countries or to international organizations). In such cases, the transfer of personal data to a country or an international organization occurs in the regime of the so-called

decision on adequate protection (if it is decided that the level of protection of personal data is in a third country or international organization comparable to the level of protection afforded by the Regulation) or is based on appropriate safeguards recognized by the Regulation (Article 46 of the Regulation) or on the consent of the data subject.

Retention of personal data

The company retains personal data only for the time necessary to fulfill the purpose of their processing according to the rules below:

- patients'/clients' personal data is kept for the period prescribed by law
- personal data of suppliers/customers and their representatives are stored for the entire duration of the contractual relationship with the Company and, to the extent necessary, also after its termination until the expiration of the relevant limitation periods in the event of any claims arising from the contractual relationship;
- personal data of users of the Website are stored only for the duration of browsing the Website and generating Website usage statistics;
- personal data of unsuccessful jobseekers are kept only for the duration of the selection process within the recruitment of new employees, unless the candidates have given their consent to longer retention of their personal data;
- personal data of employees are stored for the duration of the employment relationship and thereafter for the appropriate extent of statutory archiving period, or until the expiration of the relevant limitation/preclusion periods in the event of the exercise of any claims arising from the employment relationship.

Withdrawal of consent to the processing of personal data

In the event that the Company processes personal data with the consent of the data subject, the data subject has the right to revoke his consent to the processing of personal data at any time. This can be done by sending a notice to the address of the registered office or any establishment of the Company or by sending an e-mail message or in any other appropriate manner.

If the consent to the processing of personal data is revoked, the provided personal data will be deleted, unless the data can be processed without the consent of the relevant person on the basis of valid legal regulations. However, the revocation of the consent will not affect the processing of personal data until the consent has been revoked.

Other rights of the data subjects

Depending on the specific situation and to the extent permitted by law, each data subject may have other rights under the Regulation, i.e. in particular:

- *the right of access to personal data*, i.e. the right to obtain confirmation from the Company whether personal data relating to the data subject are or are not processed and, if so, he or she has the right to gain access to that personal data and to information on:
 - purposes of processing;

- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the planned period of storage of personal data or the criteria used to determine this period;
- the existence of the right to demand from the Company the correction or deletion of personal data or the limitation of their processing and/or to object to the processing of personal data;
- the right to lodge a complaint with the supervisory authority;
- source of the personal data, if these were not obtained from the applicant;
- the implementation of automated decision-making under Article 22 (1) and (4) of the Regulation (i.e. automated decision-making that has legal effects or significantly affects the data subject), including profiling, and information on the procedure used as well as the meaning and expected consequences for the applicant;
- on the transfer of personal data to countries outside the European Union (so-called third countries) or international organizations and on appropriate guarantees for the processing of personal data provided in connection with their transfer.

The data subject also has the right to receive a copy of the processed personal data. However, this right must not adversely affect the rights and freedoms of others.

- *the right to rectify personal data*, if the personal data are inaccurate;
- *the right to have personal data erased* („right to be forgotten“), in case of one of the following reasons:
 - personal data are no longer needed for the purposes for which they were collected or otherwise processed;
 - consent to the processing of personal data is revoked and there is no other legal reason for processing;
 - legitimate objections are raised against the processing of personal data;
 - personal data have not been processed legally;
 - personal data must be deleted in order to fulfill a legal obligation binding on the Company;
 - personal data were collected in connection with the offer of information society services to a child pursuant to Article 8 (1) of the Regulation.
- *the right to restrict processing* in the following cases:
 - the accuracy of personal data is denied for the time necessary for the Company to verify the accuracy of personal data;
 - the processing of personal data is illegal, but instead of deleting personal data, restrictions on their use are required;
 - the Company no longer needs personal data for processing purposes, but the applicant requires them to determine, enforce or defend legal claims;

- an objection has been raised against the processing in the case of the processing of personal data for the purposes of the legitimate interests of the Company or public interests, or the exercise of public authority, until it is verified whether the legitimate reasons of the Company outweigh the legitimate reasons of the objecting person.
- *the right to data transferability*, i.e. the right to obtain one's own personal data in a structured, commonly used and machine-readable format, and the right to transfer such data to another administrator (or to request the transfer of data directly by the Company to another administrator), in case the processing of personal data is based on consent or a contract and is carried out automatically;
- *the right to object*, i.e. the right to object to the processing of personal data for the purposes of the legitimate interests of the Company or public interests or the exercise of official authority; and
- *the right to file a complaint* with The Office for Personal Data Protection or at the competent authority of another State of the European Union.

Each data subject may exercise his or her rights by contacting the Company through the contact detail below.

How to contact us

In case of any questions or comments, you can contact the Company at the above address, telephone number 261 006 524 or e-mail sekretariat@mediconas.cz or at the address of any other establishment of the Company.

In connection with the processing of personal data by the Company, you may also contact the Company's personal data protection officer, Pavlína Samwellová, by e-mail: dpo@mediconas.cz or by post mail: Antala Staška 1670/80, Prague 4, 140 46.

In Prague on May 23, 2018