

Privacy Policy

1. Data processing policy

Medicyt a.s., with registered office at Holubyho 35, 902 01 Pezinok, company ID: 36 544 230 (hereinafter jointly referred to as “Controllers” or individually as “Controller”) pursuant to the regulation 2016/679 GDPR on the protection of natural persons with regard to the processing of personal data and the free movement of such data (hereinafter referred to as “Regulation”) and act no. 18/2018 on the protection of personal data and on amendment and supplementation of certain other acts, as amended (hereinafter referred to as “Act”) have elaborated and implemented security measures, which are regularly updated. These measures defines the scope and type of security steps necessary to eliminate and minimise threats and risks affecting the information system in order to ensure:

- availability, integrity and reliability of management systems using state-of-the-art information technology
- protection of personal data from loss, damage, theft, modification, destruction and to maintain its confidentiality,
- identification of potential issues and sources of compromising and to prevent them.

Contact to the Data Protection Officer: dpo@medirexgroup.sk

2. Privacy Policy

Your personal data will be stored safely, in accordance with the data storage policy and only for the time necessary to fulfil the purpose of the processing. Only the persons authorized by the Controller to process personal data, who process it on the basis of the Controller’s instructions have access to personal data. Your personal data will be backed up in accordance with the Controller’s data retention rules. Personal data kept in back-up storages is used to prevent security incidents that could arise in particular due to security compromise or damage to the integrity of the processed data.

3. Definitions

- 3.1. “*Personal data*” shall represent any information relating to an identified or identifiable natural person (hereinafter referred to as “**Data Subject**”); an identifiable natural person is an individual who can be identified directly or indirectly, in particular by reference to an identifier such as name, identification number, localization data, online identifier, or by reference to one or more items specific to physical, physiological, genetic, mental, economic, cultural or social identity of that individual;
- 3.2. “*Processing*” represents an operation or set of operations involving personal data or sets of personal data, such as obtaining, recording, organizing, structuring, storing, processing or modifying, retrieval, browsing, exploiting, provision by transmitting, disseminating or otherwise providing, rearranging or combining, restriction, erasure or disposal, regardless of performing by automated or non-automated means;
- 3.3. “*Restriction of processing*” represents the designation of stored personal data with the aim of limiting their processing in the future;
- 3.4. “*Profiling*” means any form of automated processing of personal data which consists in the use of such personal data to evaluate certain personal aspects relating to a natural person, in particular analysing or predicting aspects of the Data Subject concerning work performance, assets, health, personal preferences, interests, reliability, behaviour, their location or movement;
- 3.5. “*Pseudonymization*” refers to processing of personal data in a way, where the personal data can no longer be attributed to a person without the use of additional information, where such additional information is stored separately and is subject to technical and organisational measures with the goal of ensuring the personal data cannot be attributed to the Data Subject.
- 3.6. “*Data Processing System*” means any structured set of personal data which is accessible according to specific criteria, whether centralised, decentralised or distributed on a functional or geographical basis;

- 3.7. *"Controller"* means a natural person or legal entity, public authority, agency or another entity which, individually or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the Controller or the specific criteria for its nomination may be determined by Union or Member State law;
- 3.8. *"Processor"* means a natural person, legal entity, public authority, agency or another entity processing personal data on behalf of the Controller;
- 3.9. *"Recipient"* means a natural person or legal entity, public authority, agency or another entity receiving the personal data regardless of whether they are a third party. However, public authorities, which are entitled to receive personal data within the scope of a specific enquiry in accordance with law of the European Union or the law of a member state, are not considered recipients;; the processing of the above personal data by said public authorities is carried out in accordance with applicable data protection regulations depending on the purposes of the processing
- 3.10. *"Third party"* means a natural person or legal entity, public authority, agency or entity other than the Data Subject, Controller, Processor and persons authorized to process Personal Data under the direct authorization by the Controller or the Processor,
- 3.11. *"Consent of the Data Subject"* means any freely given, specific, informed and unambiguous indication of the Data Subject's intentions expressing consent the processing of personal data relating to him or her in the form of a statement or a clear affirmative action;
- 3.12. *"Personal data breach"* means a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed;
- 3.13. *"Genetic data"* means personal data relating to the inherited or acquired genetic characteristics of a natural person which provide unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;
- 3.14. *"Representative"* means a natural person or legal entity established in the European Union designated by the Controller or Processor in writing pursuant to Article 27, which represents the Controller or Processor with regard to their respective obligations under this Regulation;
- 3.15. *"Cross-border processing"* means either:
 - a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a Controller or a Processor in the Union where the Controller or the Processor is established in more than one Member State; or
 - b) processing of personal data which takes place in the context of the activities of a single establishment of a Controller or a Processor in the Union, but which substantially affects or is likely to substantially affect Data Subjects in more than one Member State.
- 3.16. *"Relevant and reasoned objection"* means an objection to a draft decision as to whether there has been an infringement of this Regulation, or whether envisaged action in relation to the Controller or Processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of Data Subjects and, where applicable, the free flow of Personal Data within the European Union;
- 3.17. *"International organization"* means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, a treaty between two or more countries.

4. The purpose of personal data processing

4.1. Order of goods/services → sales contract

The personal data concerning our customers that we process is processed based on a contract as laid down in Article 6(1)(b) of the Regulation. The scope of the personal data processed: *academic degree, first name, surname, birth ID number, date of birth, residential address, delivery address, telephone number and e-mail address*. The personal data is subsequently stored in accordance with Act No 395/2002 Coll. on archives and registers, as amended.

4.2. Maintenance of patients' medical records and test results

The personal data concerning our patients that we process is processed in accordance with Article 6(1)(c) of the Regulation. The scope of the personal data processed: *academic degree, first name, surname, birth ID number, home address, telephone number, e-mail address and other personal data within the scope of the request for laboratory test*. Subsequently, the personal data is stored in accordance with Act No 395/2002 Coll. on archives and registers, as amended.

4.3. Requesting an appointment for testing and other client requests via the call centre

The personal data concerning the Data Subjects is processed based on a request from the Data Subjects as laid down in Article 6(1)(b) of the Regulation. The scope of the personal data processed: typically *name and surname, birth ID number, telephone number, e-mail address and request*. The personal data is subsequently stored for a period of 10 (ten) years.

4.4. Patient/Client Zone

By registering for the Patient/Client Zone, you will have access to your test results and an overview of your state of health in one place. The personal data of Data Subjects is processed at the request of the Data Subjects as laid down in Article 6(1)(b) of the Regulation. The scope of the personal data processed: *academic degree, first name, surname, birth ID number (or, if you are not a citizen of the Slovak Republic, sex, date of birth and identity document number), home address, telephone number and e-mail address*. The personal data is then stored for the duration of the contractual relationship.

4.5. Processing of accounting documents

The processing is necessary for the fulfilment of the legal obligation of the Controller as laid down in Article 6(1)(c) of the Regulation. The scope of the personal data processed: *academic degree, name, surname, home address, telephone number, bank account number, e-mail address and signature*. The personal data is subsequently stored in accordance with Act No 395/2002 Coll. on archives and registers, as amended.

4.6 Marketing

The personal data we process for marketing purposes is processed on the basis of the Data Subject's consent as laid down in Article 6(1)(a) of the Regulation. The scope of the personal data processed: *academic degree, first name, surname, residential address, date of birth, sex, details of the Data Subject's health insurance company, telephone number and e-mail address*. The personal data is subsequently stored for a period of 5 (five) years. The Data Subject may be contacted by telephone and electronically.

The Controller hereby declares that, should the Data Subject requests in writing that the processing be terminated before the mentioned period, their personal data will be erased within 30 (thirty) days of receipt of the withdrawal of consent. When sending the newsletter by electronic mail, it is also possible to withdraw consent electronically, and by clicking on the unsubscribe button in the body of the message.

List of Processors: **Ecomail.cz, s.r.o.**, Na Zderaze 1275/15, 120 00 Praha 2.

4.7. Newsletter

Should you wish so, you may subscribe to our newsletter, which is published on our website at www.medirex.sk. Personal data will only be processed for the purpose of sending newsletter messages to the e-mail address you have provided.

By subscribing to the newsletter, you agree to the processing of your personal data. Personal data is processed as laid down in Article 6 (1) (a) of the Regulation. Your e-mail address will be processed until you unsubscribe. You can unsubscribe by clicking on the "unsubscribe" link provided in each newsletter message you receive from us. After unsubscribing, you will no longer receive any newsletter messages from us. The scope of personal data processed: *email address*.

List of Processors: **Ecomail.cz, s.r.o.**, Na Zderaze 1275/15, 120 00 Praha 2.

4.8. Complaints

In the case of complaints, personal data is processed as laid down in Article 6(1)(c) of the Regulation. Scope

of the personal data processed: *title, name, surname, home address, telephone number and e-mail address*. The personal data are subsequently stored in accordance with Act No 395/2002 Coll. on archives and registers, as amended.

4.9. Recovery of claims

In the case of debt recovery, personal data are processed as laid down in Article 6(1)(c) of the Regulation. The scope of the personal data processed: *academic degree, name, surname, home address, telephone number and e-mail address*. The personal data is subsequently stored in accordance with Act No 395/2002 Coll. on archives and registers, as amended.

4.10. Seizure of assets

The processing of personal data is necessary for the fulfilment of a legal obligation of the Controller as laid down in Article 6(1)(c) of the Regulation. The scope of the personal data processed: *academic degree, name, surname, birth number, home address*. Subsequently, the personal data is stored in accordance with Act No 395/2002 Coll. on archives and registers, as amended.

4.11. Monitoring of premises for the purpose of protecting property

Our premises are equipped with a CCTV system, which monitors the external and internal premises of the Controller for the purpose of protecting property in accordance with the Controller's legitimate interest as laid down in Article 6(1)(f) of the Regulation. The recordings from the CCTV system shall not be disclosed to third parties. They shall only be made available to authorized persons of the Controller and to IT specialists who carry out system maintenance. Personal data collected by the CCTV system shall be used for the protection of property and for the taking of evidence in administrative or criminal proceedings in cases where personal data collected by the CCTV system is used as evidence in ongoing administrative or criminal proceedings. Where the recording made is not used for the purposes of administrative or criminal proceedings, the recording shall be automatically erased by a programming operation within a period of 5 (five) days from the day following the date on which the recording was made.

4.12. Records of suppliers' and customers' representatives

The personal data we process about data subjects is processed based on the legitimate interests of the Controller as laid down in Article 6(1)(f) of the Regulation. The scope of the personal data processed: *academic degree, first name, surname, job title, job classification, job function, employee's personal number, department, place of work, telephone number, fax number, workplace email address and employer's identification data*. Afterwards the data is kept for a period of 10 (ten) years after the termination of the purpose of processing.

4.13. Direct marketing

The personal data we process about data subjects is processed based on the legitimate interests of the Controller as laid down in Article 6(1)(f) of the Regulation. The scope of the personal data processed: *academic degree, first name, surname, home address, telephone number and e-mail address*. Consequently, the personal data will be processed for the given purpose for the duration of the contractual or business relationship. The Data Subject may be contacted by telephone and electronically.

List of processors: **Ecomail.cz, s.r.o.**, Na Zderaze 1275/15, 120 00 Praha 2.

4.14. Registration of jobseekers

The processing of personal data of job applicants is carried out on the basis of the applicant's consent to the processing of personal data as laid down in Article 6(1)(a) of the Regulation. Only successful applicants will be contacted by the Controller.

No personal data is transferred to a third country. Personal data will not be used for automated individual decision-making, including profiling.

Personal data will be processed for a period of 3 (three) years after consent has been granted. You have the

right to withdraw your consent to the processing of your personal data at any time before the expiry of the aforementioned period by sending a request to the following email address: dpo@medirexgroup.sk or by sending a request to the address of the Controller with the text "GDPR - withdrawal of consent" on the envelope. The Controller declares that in the event of a written request from the Data Subject to terminate the processing of personal data before the aforementioned period, the personal data will be erased within 30 (thirty) days of receipt of the withdrawal of consent.

Joint Controller:

Medirex Servis, s.r.o., with registered office at Holubyho 35, 902 01 Pezinok, ID No.: 35 943 076.

5. Rights of the Data Subject

5.1. *The right to withdraw consent* – in cases where we process your personal data on the basis of your consent, you have the right to withdraw this consent at any time. You may withdraw your consent electronically, at the address of the data protection officer, in writing, by notice of withdrawal of consent or in person at the registered office of our company. Withdrawal of consent does not affect the lawfulness of the processing of personal data that we were processing about yourself on the basis of said consent.

5.2. *The right of access* – you have the right for provision of a copy of the personal data we have about you as well as the information about how we use your personal data. In most cases, your personal data will be provided to you in writing in hardcopy version, unless you require another method of provision. If you have requested this information using digital channels, the information will be provided to you in digital form, if technically feasible.

5.3. *The right to rectification* – we take reasonable steps to ensure the accuracy, completeness and timeliness of the information we have about you. Should you believe that the data we keep is inaccurate, incomplete or out of date, please do not hesitate to ask us to rectify, update or complete this information.

5.4. *The right to erasure (the right to be forgotten)* – you have the right to request erasure of your personal data, for example if the personal data we have obtained about yourself is no longer needed to fulfil the original purpose of the processing. However, this right must be assessed while considering all relevant circumstances. For example, we may have to fulfil certain legal and regulatory obligations, which means that we may not be able to comply with your request.

5.5. *The right to restrict processing* – under certain circumstances, you have the right to request us to stop using your personal data. For example, these may be the cases when you think the personal information we hold about you may be inaccurate or when you think we no longer need to use your personal information.

5.6. *The right to data portability* – under certain circumstances you have the right to require us to transfer the personal data you have provided to another third party of your choice. However, the right to data portability only applies to personal data that we have obtained from you with your consent or under a contract to which you are a party.

5.7. *The right to object* – you have the right to object to the processing of data which is based on our legitimate interests. Where you file objection and we do not have a compelling legitimate and justified reason to data processing, we will discontinue processing of your personal data.

Should you believe that any personal information we hold about you is incorrect or incomplete, please contact us. If you wish to object to the way we process your personal data, please, do contact our Data Protection Officer by email at dpo@medirexgroup.sk or in writing at:

Medicyt, a.s.

Holubyho 35

902 01 Pezinok

Our Data Protection Office will investigate your objection and will work with you to resolve the matter.

Should you believe that your personal data is being processed unfairly or unlawfully, you may lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; telephone number: +421 /2/ 3231 3214; e-mail: statny.dozor@pdp.gov.sk, <https://dataprotection.gov.sk>.

1.2.2025