

THE DECLARATION ON THE PROCESSING OF PERSONAL DATA

The synlab czech s.r.o. company, registered office: Sokolovská 100/86, 186 00, Prague 8, Company Registration Number: 49688804, Tax Identification Number: CZ699003979 (hereafter referred to as “**the synlab company**” or “**synlab**”) has issued this Declaration on the Processing of Personal Data (hereafter referred to as the “**Declaration**”) in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and (General Data Protection Regulation) (hereafter referred to as the “**GDPR**”) which came into effect on 25 May 2018.

The Czech version of the GDPR is available online at the following internet address:

<https://eur-lex.europa.eu/legal-content/CS/TXT/?uri=CELEX:32016R0679>

The information for the employees and other synlab workers pertaining to the GDPR has been prepared in a separate document which synlab has issued for its employees.

This Declaration has mainly been issued by synlab for the purpose of providing information to its clients (patients) and other contractual partners (especially medical facilities).

I The Introduction

The synlab company places great store by the trust that our clients and contractual partners have placed in us. As such, the protection of their privacy and personal data is of the utmost importance to us. For this reason, synlab has issued this Declaration so that our clients and contractual partners can obtain sufficient information with regard to the handling of their personal data and the rights they have in that regard.

II What will you learn in this document?

- An explanation of the main terms (Article III)
- The purpose of and legal basis for the processing of your data (Article IV)
- The categories of processed personal data (Article V)
- Data processing on the basis of consent (Article VI)
- The contact information associated with personal data protection (Article VII)
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- The period of storing the personal data (Article IX)
- The rights of the data subjects in relation to the protection of their personal data (Article X)
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III An explanation of the main terms

To begin with, we would like to explain the main terms that will be used in this Declaration. These terms have been taken from the GDPR, where you can find their precise legal definition.

We have taken the liberty of simplifying some of the legal definitions for the purposes of this Declaration.

The terms below have been used in this Declaration with the following meanings:

“**personal data**” = any information about a data subject

“**a data subject**” = a unique natural person who can be directly or indirectly identified on the basis of certain information

“**processing**” = any operations involving personal data, especially the collection, recording, organisation, structuring, storage, adaptation or alteration, searching, viewing, use, provision by transfer, dissemination or any other provision of access, arrangement or combination, limitation, deletion or destruction thereof

“**the personal data administrator**” = a natural person, legal entity or public authority body that designates the purposes for and the means of processing any personal data

“**the personal data processor**” = a natural person, legal entity or public authority body that processes the personal data for the administrator

IV The purpose of and legal basis for the processing of your data

The synlab company is usually the administrator of any personal data that it processes. In some less frequently occurring cases, synlab is merely the processor of the personal data (especially if synlab performs an examination at the request of another laboratory and for a client of said laboratory).

The administrator is the entity that stipulates the purposes for processing the personal data and the means of processing and is primarily responsible for the processing. The administrator processes the personal data for various purposes based on its activities (for example, on the basis of any statutory obligations or in order to ensure the correct fulfilment of its contracts), but it can also process it for its own set purposes, i.e., for the purposes of its own justified interests, provided said interests do not exceed the interest in protecting the fundamental rights and freedoms of the data subject.

The processor is an entity that the administrator charges with performing processing operations on the personal data on the administrator’s behalf. In other words, the processor processes the personal data for the administrator. The processor differs from the administrator in that it can only perform the processing operations that the administrator has assigned it as part of the processor’s activities for the administrator or that arise from the activities which the administrator has charged the processor with performing.

The synlab company processes data on the following grounds:

1. the processing is essential for the fulfilment of the legal obligations that apply to synlab;
2. the processing is essential for the fulfilment of the contract, to which the data subject is a party;
3. the processing is essential for the purposes of the justified interests of the administrator or a third party;
4. the data subject has provided consent for the processing of their personal data.

The specific legal grounds and purposes for processing the data have been described for the individual categories in the following article.

The processing of personal data is primarily performed at the synlab premises by duly trained synlab workers or it is performed by third party processors that synlab has charged with performing the processing in specific cases. The processing is performed either using computer technology or manually in the case of any personal data that is in certificated form,

while adhering to the adopted security principles aimed at securing the correct handling of the personal data, including the data and security integrity of the appropriate systems.

To this end, synlab has adopted technical and organisational measures aimed at ensuring the protection of the personal data and in particular measures aimed at preventing any unauthorised or random access to the personal data, the realisation of any changes to the data or the destruction or deletion thereof, any unauthorised transfers, any unauthorised processing of the data or any other form of abuse of the personal data.

In compliance with the GDPR, synlab may submit the personal data to other European Union countries, especially when using information systems, where the operators of the given cloud services have server storage sites located in other European Union countries.

All the entities that may be granted access to the data shall respect the right of the data subjects to the protection of their privacy and are obliged to proceed according to the valid legal regulations pertaining to personal data protection.

V. The categories of processed personal data

Given the nature of the activities performed by synlab (i.e., the provision of medical services according to the special acts, especially Act no. 372/2011 Coll. on medical services and the conditions for their provision, as amended), synlab predominantly processes personal data to meet its contractual obligations, especially for the purpose of maintaining medical documentation. This essentially involves the following personal data categories:

- **Identifying data** – the name, surname, personal identification number, date and place of birth, place of residence/registered office, health insurance company, health insurance number, signature
- **Contact data** – the contact address, telephone number, email address and other similar information
- **Medical data (this involves a special personal data category)** – the case history, diagnosis, results of laboratory examinations, medical records, genetic information and similar sensitive information pertaining to the health of the company's patients

The synlab company further processes personal data for the purpose of the performance of its rights and responsibilities from the contracts which synlab has concluded with its contractual partners (especially the operators of medical services, patients – private clients, customers and suppliers); this involves the following personal data categories:

- **Identifying data** – the name, surname, personal identification number, date of birth, place of residence/registered office, health insurance company, health insurance number, Company Registration Number, Tax Identification Number, facility/site identification number, signature
- **Contact data** – the contact address, telephone number, email address, fax number and other similar information
- **Information about education/qualifications** – expertise, ongoing education and the certification of any achieved qualifications and their furtherance and any other similar information
- **Payment data** – the bank account number, payment history

The processing of the aforementioned personal data is **essential for the fulfilment of the synlab company's obligations as a provider of medical services and for the fulfilment of**

the concluded contracts. The synlab company therefore **does not need the consent of the given data subjects to process the personal data in these cases.**

The synlab company also processes some personal data of its clients and contractual partners or third parties, when it is essential to do so in order to protect its assets and other justified interests. In all these cases, however, the synlab company does its utmost to ensure that these rights do not outweigh the interests or the fundamental rights and freedoms of the data subjects whose personal data is to be processed.

The synlab company operates a camera system in some of its premises for the purposes of protecting its property. The operation of the camera system is subject to strictly stipulated rules and it is only operated at the minimum necessary extent so that it does not excessively impinge upon the privacy of individuals.

This personal data processing is **essential for the purposes of the synlab company's justified interests and synlab therefore also does not need the consent of the given data subject to process this personal data.**

VI Data processing on the basis of consent

There is a narrow category of personal data which synlab processes on the basis of the consent of the data subject.

We need your consent when processing information that does not fall under any of the aforementioned categories. In this narrow personal data category, we process, for example, data concerning any visits to the synlab company's website (especially using cookies or the IP address of the visitor to the website and similar information).

You are not obliged to provide us with this data and it is only processed on the basis of your consent. **You are entitled to withdraw the consent to process the aforementioned information at any time.**

VII The contact information for the synlab company as the personal data administrator

Corporate name: **synlab czech s.r.o.**

Company Registration Number: 496 88 804

registered office: Sokolovská 100/94, Karlín, 186 00, Prague 8

incorporated in Section C, File 23895 of the Commercial Register held at the Municipal Court in Prague

E-mail: **poverenec@synlab.cz**

VIII The categories of recipients of the processed personal data

Despite the fact that it is the synlab company's goal to process the personal data in-house, it is sometimes necessary to transfer the personal data to other entities (known as personal data recipients) in some cases. The synlab company has established internal processes to protect the personal data in such a way so that the personal data is only submitted to specified third parties and only at the essential extent in justifiable cases.

In order to be able to comply with the legal obligations imposed upon it by the statutory regulations or the concluded contracts, synlab transfers data about its clients (patients) and contractual partners to certain third parties, which especially include health insurance

companies, other medical service operators, the tax administrator and also the processors authorised by synlab to process the personal data for the purpose of fulfilling its legal and/or contractual obligations (the data archiving operator, auditors, external lawyers, the operators of the synlab company's IT systems, the entities that perform the settlement for the provided medical services and so on).

IX The period of storing personal data

The synlab company has internal rules that allow it to only store your personal data for the essential period. The data that synlab has to process in order to fulfil its legal responsibilities is therefore stored for the period stated in the appropriate legal regulations.

The period of processing and storing the data at the synlab company is mainly given by the legal deadlines stipulated in Medical Documentation Regulation No. 98/2012 Coll., as amended, Act No. 582/1991 Coll. on the organisation and performance of social security, as amended and Accounting Act no. 563/1991 Coll., as amended (for example, this sometimes amounts to a period of up to 100 years in the case of medical documentation).

The personal data that cannot be processed without your consent on any of the aforementioned legal grounds is therefore only processed with your consent and for the period of time that the consent remains valid.

The recordings made by the synlab company's camera system are regularly deleted from the appropriate data storage site within three business days of being made (this data is replaced with the current recordings). A longer storage period for the recordings from the camera system is only admissible, if it is apparent from a recording that unlawful actions have been performed in relation to the synlab company's property or any other of its rights and protected interests.

The synlab company has created filing and shredding rules and has appointed a shredding committee which regularly reviews the stored documentation and supervises the shredding and deletion of data.

X The rights of the data subjects in relation to the protection of their personal data

You have the following rights in relation to the processing of your personal data under certain conditions:

- **The right of access to the personal data** that pertains to you – you are entitled to request a copy of the personal data that synlab processes about you;
- **The right to correct the personal data**, if the personal data is incorrect or incomplete;
- **The right to the deletion of personal data** pertaining to your person (the right to “be forgotten”), whereby synlab will destroy your personal data and will no longer store it (only in the designated cases);
- **The right to limit the processing of the personal data** that pertains to you (only in the designated cases);
- **The right to lodge an objection against the processing** (only in the designated cases) or to **lodge a complaint** with the supervisory body which is the Office for Personal Data Protection (registered office: Pplk. Sochora 27, 170 00, Prague 7), if you are of the opinion that the processing of the personal data is in breach of the GDPR or any other legal regulation;

- **The right to the portability of data** (only in the designated cases), i.e., (i) the right to acquire (i.e., mainly download) the personal data that applies to you and which you have provided to synlab and (ii) the right to transfer this data to another administrator without having synlab prevent this (this therefore involves the direct provision of personal data processed by the synlab company to another administrator).

XI The consequences of not providing any personal data

The provision of the personal data of the synlab company's clients or contractual partners, which synlab requires for the purposes of maintaining the medical documentation at the extent stipulated by the appropriate legal regulations and for the fulfilment of its obligations as a medical services provider, is a statutory requirement and is also essential for the synlab company's fulfilment of the appropriate contract. Without the provision of this personal data, the synlab company would not be able to meet its statutory and contractual obligations.

The provision of any personal data that is only processed on the basis of your consent is absolutely voluntary. The non-provision or revocation of the consent will not have any consequences for you in such a case. Nevertheless, if your consent is revoked, the personal data that was processed prior to the revocation of your consent will be preserved in compliance with the legal regulations.