

Information on the processing of personal data through the CCTV system

pursuant to 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)

A. Personal data controller and operator of the CCTV system

The personal data controller is **THE CLINIC s.r.o.**, ID No.: 463 49 031, with registered office at Na Florenci 2116/15, Nové Město, 110 00 Prague 1, a company registered in the Commercial Register kept by the Municipal Court in Prague under file No. C 10611.

Contact details of the data controller:

- gdpr@the-clinic.cz
- +420 604 10 11 10

The camera system is operated by the company **TECHart systems s.r.o.**, ID No.: 26172615, with registered office at Machatého 679/2, Hlubočepy, 152 00 Prague 5, a company registered in the Commercial Register kept by the Municipal Court in Prague under file No. C 76785.

Contact details of the processor:

- ruzek@techart.cz

B. Purposes and legal bases for processing, method and scope of processing

We process your personal data through the CCTV system for the purpose of protecting the property and safety of the controller and persons on the premises of The Clinic, and to make sure that the health services are provided properly.

We process your personal data for the above purposes on the basis of the controller's legitimate interest in protecting the property and safety of persons and the proper provision of health services to patients.

The place of processing of personal data of the data subjects is the office The Clinic at Na Florenci 2116/15 - Praha 1. The camera system consists of 7 cameras, which capture the following areas:

- waiting room;
- sterilization room (available only for our personnel);
- surgeries.

We respect the right to privacy of all persons on the premises of The Clinic. Cameras do not record areas where there may be unreasonable intrusions into the privacy of data subjects.

C. Personal data subjects

The CCTV system processes personal data of all persons who are on the premises of The Clinic, i.e. in particular (but not exclusively):

- a) patients and their legal representatives or companions;
- b) the controller's personnel;
- c) suppliers and business partners of the controller.

D. Personal data processed and retention period

We process the following personal data within the scope of the camera footage using the camera system:

- a) the likeness of data subjects;
- b) movement of data subjects;
- c) behaviour and other manifestations of data subjects in the monitored premises.

We process and store personal data for as long as necessary, up to a maximum of 72 hours. After this period, the records are automatically overwritten with a new record. If the records need to be used for investigations by public authorities, these records will be retained as directed by the public authorities.

E. Who processes your personal data and to whom do we transfer it?

All the above-mentioned personal data are processed by us as the controller. This means that we determine the above defined purposes for which we collect your personal data, determine the means of processing and are responsible for its proper execution.

We generally do not pass on your personal data to other controllers. The exception is where we transfer your personal data to public authorities for the purposes of an investigation in accordance with the provisions of the law.

In addition to the controller, personal data may also be processed by the processor (the operator of the camera system - TECHart systems s.r.o.) for the purposes described above, exclusively on the basis of and within the limits of our instructions. The processor is obliged by the processing contract to comply with the requirements of data protection legislation, in particular to protect your personal data.

We do not transfer your personal data to countries outside the European Union and the European Economic Area.

F. What rights do you have when processing personal data?

Just as we have rights and obligations when processing your personal data, you also have certain rights related to processing your personal data. These rights include:

F.1 Right of access

You have the right to know what data we process about you, for what purpose, for how long, where we obtain your personal data, to whom we transfer it, who processes it outside of us

and what other rights you have in relation to the processing of your personal data. You have learned all of this in this Information on the processing of personal data. However, if you are unsure which personal data we process about you, you can ask us to confirm whether or not the personal data relating to you is processed by us and, if so, you have the right to access that personal data. As part of your right of access, you may ask us for a copy of the personal data we are processing, and we will provide you with the first copy free of charge and subsequent copies for a reasonable fee.

F.2 Right to rectification

If you find that the personal data we process about you is inaccurate or incomplete, you have the right to have it rectified without undue delay.

F.3 Right to erasure

In some cases, you have the right to have us delete your personal data. We will delete your personal data without undue delay if one of the following reasons is met:

- a) we no longer need your personal data for the purposes for which we processed it;
- b) you exercise your right to object to processing (see "Right to object to processing" below) for personal data that we process on the basis of our legitimate interests and we find that we no longer have such legitimate interests that would justify such processing; and/or
- c) it turns out that the processing of personal data carried out by us is no longer in accordance with generally binding regulations.

The right to erasure does not apply if the processing of your personal data is still necessary for:

- a) to fulfil our legal obligation;
- b) for archival, scientific or historical research or statistical purposes; and/or
- c) establish, exercise or defend our legal claims.

F.4 Right to restriction of processing

In some cases, in addition to the right to erasure, you can exercise the right to restrict the processing of personal data. This right allows you in certain cases to request that your personal data be marked and not subject to any further processing operations - in this case, however, not forever (as in the case of the right to erasure), but for a limited period of time. We must restrict the processing of personal data when:

- a) you dispute the accuracy of the personal data before we agree what data is correct; we process your personal data without a sufficient legal basis (e.g. beyond what we need to process), but you will prefer restricting such data to deleting it (e.g. if you expect to provide us with such data in the future anyway);
- b) we no longer need your personal data for the above processing purposes, but you require it for the establishment, exercise or defence of your legal claims; and/or

- c) you object to the processing. The right to object is described in more detail in the section "Right to object to processing" below. We are obliged to restrict the processing of your personal data for the period of time that we are investigating whether your objection is justified.

F.5 Right to portability

You have the right to obtain from us all your personal data that you yourself have provided to us and that we process on the basis of the performance of the contract. We will provide you with your personal data in a structured, commonly used and machine-readable format. In order to be able to easily transfer the data at your request, it may only be data that we process automatically in our electronic databases. We are therefore unable to transfer all the data we process to you in this form at all times and under all circumstances.

In the case of CCTV footage, the right to data portability is not applicable.

F.6 Right to object to processing

You have the right to object to the processing of your personal data based on our legitimate interest. We will not continue to process your personal data unless we have compelling legitimate grounds for continuing to do so.

F.7 Right to lodge a complaint

Exercising your rights in the above manner is without prejudice to your right to lodge a complaint with the Office for Personal Data Protection in the manner set out in the following section. You can exercise this right in particular if you believe that we are processing your personal data unlawfully or in violation of generally binding legal regulations.

G. How can I exercise individual rights?

You can contact us on all matters relating to the processing of your personal data, whether it is a query, exercising a right, lodging a complaint or anything else, using the following contacts:

- a) E-mail: gdpr@the-clinic.cz
- b) Delivery address: **THE CLINIC s.r.o.**, Na Florenci 2115/16, Nové Město, 110 00 Prague 1

We will process your request without undue delay, but within one month at most. In exceptional cases, in particular due to the complexity of your request, we are entitled to extend this period by a further two months. We will, of course, inform you of any such extension and the reasons for it.

G.1 Filing a complaint with the Office for Personal Data Protection

You can file a complaint against our processing of personal data with the Office for Personal Data Protection, which is located at Pplk. Sochora 27, 170 00 Prague 7.