

Information text for clients on the processing of their personal data

Dear Clients, 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), which entered into force on 25 May 2018, imposes a number of obligations on us regarding the protection of your personal data. Please be assured that we place the utmost importance on compliance with these obligations and would like to provide you with important information regarding the processing of your personal data.

1. Contact details of the controller

Spa Luhačovice, a.s., with registered office at Lázeňské náměstí 436, 763 26 Luhačovice, ID No.: 46347828, registered in the Commercial Register maintained by the Regional Court in Brno, Section B, Insert 809 (hereinafter referred to as the "Controller").

2. What data do we process?

- **Contact personal data** contained in the registration card you filled in when you started your stay in our spa: o name and surname, title if applicable
 - date of birth
 - permanent address
 - telephone and e-mail address
 - license plate number
 - in the case of foreigners, the information required by law for reporting the stay of foreigners (nationality, travel document number, visa number)
- **the data contained in the spa care application** - in addition to the contact details also:
 - details of the health insurance company
 - insurance number
 - details of the proposing doctor
 - employer's details
 - diagnosis data
 - details of the proposed length of stay
- **details of your treatment stays** - details of health care services provided to you in our facilities and other data required by health insurance companies in the case of reimbursable spa and rehabilitation services
- in the case of self-payers, **details of the payment for the stay** (including your account number, if applicable).

3. On what basis, for what purpose and for how long do we process your personal data?

We process the data contained in the application for spa care and the data filled in the registration card, together with the data on the payment of the stay, **on the basis of the legal relationship between you and our spa**, the subject of which is the provision of spa medical rehabilitation care and related services (accommodation, catering, etc.). The purpose of such processing is the provision of the services mentioned. Our spa receives the proposal for spa care from your health insurance company.

Similarly, we also process data about your medical stays on the same legal basis, and in the case of reimbursable spa and rehabilitation care services (comprehensive or contributory care), this is supplemented by our obligation to provide the health insurer with data about the health care services provided to you in our facilities and other data required by health insurers and to enable their control by the insurers.

In the case of foreigners, we process data necessary for reporting the stay of foreigners, **based on the obligation imposed on us by Act No. 326/1999 Coll.** on the stay of foreigners in the territory of the Czech Republic and on the amendment of certain acts, as amended. We carry out this processing solely for the purpose of fulfilling this obligation, which includes the transmission of the data contained in the registration form to the Aliens Police.

The sending of commercial communications without your consent must be directly related to the service or goods provided in the performance of a contract (order) under which the customer's personal contact details were obtained. The processing of personal data for direct marketing purposes is based on the **legitimate interest of the controller**. You can refuse further receipt of these marketing communications at any time.

Where you have given, us consent to process your contact details and details of your stay with us, we will process this data on the basis of **your consent**. The purpose of the processing here is our ability to inform you about our service and product offers.

For the purpose of providing spa and rehabilitation care and related services, we process data on the care provided for the duration of your stay at our spa and after the end of your stay for as long as the health insurance company is entitled to carry out an audit of the covered services provided and their billing on the basis of generally binding legal regulations. Similarly, in the case of contributory care, or in the case of care paid for by a self-payor, we process data on the care provided for as long as the self-payor is entitled to dispute the provision of care.

The billing and tax documents we use to account for the care provided also contain some personal data (name of the client, type of service provided, date of issue of the document). We keep these documents only **for the purpose of complying with the obligations set out in the relevant accounting and tax legislation**, for the period of time imposed by such legislation.

In our spa, there are no cases where the services provided are disputed by the health insurance company or by you as a self-payer. If such a case were to occur, we would be required to process data about the care provided for the duration of the dispute, solely for the purpose of protecting our rights in such a dispute. In the event of such processing of your personal data, we would inform you of this without undue delay.

In order to protect property and persons against unlawful acts, CCTV systems are installed in our premises. **We process recordings from the cameras**.

We have strict mechanisms in place to protect your data. In the case of data that we process on the basis of your consent, the processing period is limited to the period of validity of the consent, generally 10 years, unless the consent is withdrawn earlier.

4. Are you obliged to transfer personal data to us?

The transfer of the data you transmit to us with your consent is voluntary. We require the transfer of other data because the processing is necessary for the performance of a contract, the fulfilment of our legal obligations or the protection of our legitimate interests. If you do not provide us with such data, we cannot provide you with the relevant product, service or other performance where we require personal data from you.

We only collect and process certain data with your consent. These are mainly data processed for marketing purposes. The transfer of this data to us is voluntary. You can withdraw your consent at any time.

In other cases where we ask for personal data from you, it is compulsory to provide it. We typically collect identification data from you because we need this data to enter into and perform a contract with you, to comply with our other legal obligations or to protect our legitimate interests.

5. To whom do we disclose or transfer your personal data?

We transfer and disclose personal data to authorities or institutions to which such right is derived from the law (health insurance companies, foreign police, the City of Luhačovice and others - e.g. the client's employer who participates in the payment of medical and rehabilitation services and accommodation).

We may transfer your personal data to third parties providing support activities or professional and specialized services for us - suppliers of information systems, mailing, debt collection, or legal services. These third parties are in the capacity of data processors, we only pass on to them the personal data necessary for the purpose, and only the data of those clients to whom the specific support activity relates. We carefully select each such entity and enter into a personal data processing agreement with each of them, in which such entity has obligations as a processor to protect and secure personal data.

We do not pass on camera footage to any other person except to law enforcement or administrative authorities.

We do not transfer your personal data to other countries.

6. Your rights under applicable law

We process your data transparently, fairly and in accordance with the law. You have the right to access your data, to an explanation, as well as other rights if you believe that the processing is not in order. We would also like to inform you that you have the following rights under current data protection legislation:

- **The right to access the personal data** we process in your case, for which we may request a reasonable fee not exceeding the costs necessary to provide the information. You will receive your transactional data principally in the form of statements about the relevant service you are using. You can submit your request by:
 - electronically by email with a certified signature
 - in writing bearing a certified signature or in person, whereby your identity will be verified when you submit it. On the envelope, please clearly indicate the words "PERSONAL DATA"
- **the right to have your personal data rectified** should it be incorrect or inaccurate in any respect
- in the event that you become aware or believe that we are processing your personal data in a way that is contrary to the protection of your private and personal life or contrary to the law, in particular if your personal data is inaccurate in relation to the purpose of its processing, you have **the right to ask us for an explanation** and also to request that we remedy the situation (e.g. by blocking, correcting, supplementing or destroying your personal data)
- **the right to request the erasure of your personal data or, where appropriate, the restriction of its processing**
- **the right to object to processing** in order to assess whether there has been a breach of the obligations imposed on us by applicable law
- where we process your personal data on the basis of consent, you have **the right to withdraw consent**
 - in addition to the above, you also have **the right to lodge a complaint** with the supervisory authority, which is the Office for Personal Data Protection, located at Pplk. Sochor 27, 170 00 Prague 7
- you also have **the right to the portability of** the data you have provided to us and which we process on the basis of the necessity of their processing for the purpose of contract performance. In the event that you wish to transfer this data to another controller, we will enable you to obtain

your personal data in a structured, commonly used and machine-readable format or, if technically feasible, we will transfer it directly to another controller.

In case of any uncertainties or questions regarding the processing of your personal data, you can contact us at any time in writing at Lázně Luhačovice, a.s., Lázeňské náměstí 436, 763 26 Luhačovice, or you can also contact our Data Protection Officer by e-mail at **gdpr@lazneluhacovice.cz**.

In Luhačovice, 22 May 2018