Information on the Processing of Personal Data

Personal data controller

Léčebné lázně Konstantinovy Lázně a.s., Company ID No. 290 90 300, registered office at Plzeňská 58, 349 52 Konstantinovy Lázně, registered in the Commercial Register maintained by the Regional Court in Plzeň, Section B, File 1529 (the "Controller"), hereby informs its clients (the "Client"), to whom it provides services as part of therapeutic stays, in particular spa care, rehabilitation care, accommodation, catering and other services entered in the Commercial Register (the "Services"), about the processing of their personal data in accordance with applicable legislation governing personal data protection, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the General Data Protection Regulation).

In fulfilling its statutory obligations, the Controller is authorised to process its Clients' personal data for the purposes set out below, to the corresponding extent and for the necessary period. Contact details of the Controller: Plzeňská 58, 349 52 Konstantinovy Lázně; telephone +420 374 615 513; e-mail rostislav.matyas@konstantinovy.cz.

I. Purposes of personal data processing

The Controller processes personal data on the basis of the legal relationship, in particular a contract, between the Controller and the Client in connection with providing the Services described above. Personal data are processed for the provision of Services in accordance with legal provisions governing spa and related services. The Controller also processes personal data for local-fee records, for health-insurance purposes and, in the case of foreign nationals, for the purposes and needs of the Foreign Police.

II. Scope of personal data processed

The Controller processes personal data to the following extent:

- first name and surname, or title;
- date of birth;
- permanent residence address;
- telephone number and e-mail address;
- for foreign nationals, data required by law for reporting their stay, including nationality, passport number and visa number;
- health-insurance information and insurance number;
- information about the referring doctor, employer, diagnosis and proposed length of stay;
- information about health care provided in the Controller's facilities and other information required by health insurers in the case of reimbursed spa therapeutic rehabilitation care.

III. Retention period for personal data

Your personal data will be processed for the period required by generally binding legal provisions, including archival rules, whether the information is provided compulsorily or voluntarily, or on the basis of our request for the purposes of performing a contract. This also includes your e-mail address for marketing purposes. Exceptions apply where you have been informed otherwise in advance, the reason for processing ceases to exist, or the data are processed on the basis of consent granted for a different period. Personal data will not continue to be processed where you have validly objected, withdrawn consent, or in similar cases.

As a general rule, personal data are retained for 10 years from collection of the specific item of personal data; this period currently applies to the retention of accounting and tax documents and medical records. With regard to statutory retention and disposal periods, disposal takes place after the end of the calendar year in which the retention period for the document or personal data has elapsed.

For all personal data, including data processed on the basis of your explicit consent, the Controller carefully considers the specific purpose and selects an appropriate processing period and the validity period of consent, which will not exceed the 10 years stated above.

IV. Method and principles of processing Personal Data and information on Client rights

The Controller is authorised to process personal data manually or automatically through its authorised employees, specialised companies such as accountants and tax advisers, and cooperating lawyers with whom it has concluded a personal data processing agreement. Personal data are stored in secure databases.

The Controller declares that all processing of Client personal data, including any necessary transfers, is carried out with priority given to the Client's privacy and in accordance with applicable legal provisions, in particular legislation governing personal data protection and the practice of law.

In relation to the processing of personal data, the Client may exercise the rights set out below against the Controller in person at the company's registered office, in writing at the Controller's correspondence address stated above, or electronically.

Right of access, rectification, restriction and erasure of personal data

The Client has the right to obtain information from the Controller as to whether personal data concerning the Client are being processed. If the Controller processes the Client's personal data, it must provide the Client with a copy of the processed personal data free of charge. The Client also has the right to rectification of inaccurate personal data and completion of incomplete personal data, taking into account the purposes of processing, including by means of a supplementary statement.

The Client also has the right to restriction of processing in any of the following cases:

- the Client contests the accuracy of the personal data, for the period needed for the Controller to verify their accuracy;
- the processing is unlawful and the Client opposes erasure and requests restriction of use instead;
- the Controller no longer needs the personal data for the stated purpose, but the Client requires them for the establishment, exercise or defence of legal claims;
- the Client has objected to processing, pending verification of whether the Controller's legitimate grounds override those of the Client.

At the Client's request, the Controller will erase personal data without undue delay where one of the following applies:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;

- the Client withdraws consent on which the processing is based and there is no other legal ground for processing;
- the personal data have been processed unlawfully;
- the personal data must be erased for compliance with a legal obligation under European Union or Member State law applicable to the Controller.

Right to data portability

The Client has the right to receive personal data concerning the Client that the Client has provided to the Controller and that are processed by automated means, provided that at least one of the following conditions is met:

- the personal data are processed for specified purposes on the basis of the Client's consent;
- the data concern a special category of personal data processed for one or more specified purposes on the basis of the Client's explicit consent; or
- processing is necessary for performance of a contract to which the Client is a party or for steps taken before entering into a contract at the Client's request.

The Controller will provide the Client's personal data in a structured, commonly used and machine-readable format. The Client may transmit the obtained personal data to another controller and may choose whether the Controller provides them to the Client or transmits them directly to another controller or processor, where technically feasible.

Right to object

Where personal data are processed on the legal basis of the Controller's legitimate interests, the Client has the right to object to the processing for reasons relating to the Client's particular situation. On receiving an objection, the Controller will stop processing the personal data, retaining them only, and assess whether it has compelling legitimate grounds for processing that override the Client's interests, rights and freedoms, or grounds for the establishment, exercise or defence of legal claims. If such grounds exist, the Controller will inform the Client, communicate the possibility of further remedies and continue processing. Otherwise, it will inform the Client, stop processing and erase the personal data.

Handling Client requests when exercising rights

The Controller enables Clients to submit requests in different forms depending primarily on the relationship between the Controller and the Client, including in writing on a form or electronically. Where a request is submitted electronically, information will be provided in a commonly used electronic form unless the Client requests another method. The Controller will inform the Client about action taken on the request within one month of receipt, and at the latest within three months where the period is extended due to justified necessity.

Right to lodge a complaint with the Office for Personal Data Protection

A complaint may be lodged by e-mail at posta@uoou.cz; via the data box ID qkbaa2n; by telephone at +420 234 665 111; or in writing at Pplk. Sochora 27, 170 00 Prague 7, or with another competent supervisory authority in connection with personal data processing.

V. Recipients of personal data

Under the conditions laid down by applicable law, the Controller may transfer Client personal data for further processing to persons (recipients) who process the data solely for the activities for which the Controller has authorised them. Transfers are made mainly on the basis of a personal data processing agreement, to fulfil the Controller's legal or contractual obligations, on the basis of the Client's consent, or on the basis of the Controller's legitimate interests.

Where the Controller processes personal data for local-fee records, it transfers them to the competent authority. Under applicable legislation, it is obliged to make personal data of foreign nationals available to the Foreign Police.

The Controller also makes personal data available to the health insurer paying for the spa stay, where the stay is reimbursed, for the statutory checks required of health insurers.

The Controller may transfer Client personal data to third parties providing support services to Clients, such as certain health-care procedures including biological-material analyses, parcel dispatch, debt collection, software development and maintenance, or processing customer requests. The Controller transfers only the personal data necessary for the given purpose and only data concerning the Client to whom the relevant support service relates. These service providers and processors are bound by the Controller's instructions and process Client personal data exclusively in accordance with applicable law.

In Konstantinovy Lázně, 25 May 2018