

Personal Data Processing policy

Pursuant to 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 on the free movement of such data (the "Regulation"), we would like to inform you of the processing of your personal data, especially in connection with securing the testing of you or your workers or the workers of our contractual partner, whose contact person you are, for indications of disease caused by the SARS-CoV-2 virus or other indication of your, or their, state of health (hereinafter the "testing"), as well as the use of our website nutrimedlab.cz.

This information does not apply to the personal data of legal entities, including their name, legal form and contact information for the legal entity.

This information is available on our website nutrimedlab.cz for your future reference.

Who is the controller of your personal data?

The controller of your personal data is our company, NutriMed Lab, s.r.o., Business ID No. 09749438, with its registered office at Václavské náměstí 793/36, 110 00 Prague 1, Czech Republic

What data about you do we process as data controller, and from what sources do the said data come?

If we are securing or arranging your testing, then we are processing in particular the following personal data:

- first and last name;
- or last name at birth;
- or date of birth and birth identification number;
- address of residence;
- phone number;
- e-mail address;
- or nationality / citizenship;
- or place of birth;
- or information on state of health;
- payment/invoicing details;
- information on the service you requested from our company (in particular the type and variant of testing);
- information regarding the communication between us.

The above-mentioned data are a contractual requirement of our company, as we have it in our information system and we cannot secure or arrange your testing and/or meet our contractual obligations in accordance with legal regulations without it. We verify your identity by checking your ID card, passport or health insurance card.

If we are securing or arranging the testing of your workers, then we are processing in particular the following personal data:

- identification data;
- contact information;
- information about your representatives;
- invoicing information;
- payment details;

- information on the service you requested from our company;
- information regarding the communication between us;

all the above-mentioned data is a contractual requirement of our company, as we cannot perform the service you have ordered without it.

If you are a contact person for our contractual partner for whom we are securing the testing of their workers, then we are processing in particular the following personal data:

- identification data;
- contact information;
- information regarding the communication between us.

If you contact us (e.g. using the contact form on our website), then we are processing in particular the following personal data:

- identification data;
- contact information (e.g. e-mail address);
- information regarding the communication between us;

whereas, if you are also our (potential) customer or contractual partner or their contact person, we also process your personal data as set forth above.

If you sign up to receive our newsletter and other commercial communications on our website by electronic means, we will process your e-mail address.

If you set up an account on our website nutrimedlab.cz, we will process in particular the following personal data:

- name;
- address;
- e-mail address;
- phone number;
- payment details;
- orders and reservations;
- in the event of registration by signing up via social media, also information concerning your account on that social media platform in connection with privacy settings for that social media platform. For that reason we recommend that you review the privacy policy statement for these social media platforms to get more information about your privacy settings. Please also take into account that you are not required to use your social media account to complete the registration.

We acquired the data we are processing about you from the following sources:

- the data was provided by you;
- the data was provided by our contractual partner, whose contact person you are or who arranged contact between us and you at your request;
- the data was provided by the laboratory performing the laboratory examination;
- we may acquire the data from social media operators if you register on our website www.nutrimedlab.cz via said social media platforms.

On what legal basis do we process your personal data?

We process your personal data as listed above because:

- said processing is necessary for concluding and performing under the contract conducted between you and our company, in particular the contract to secure or arrange testing for you or your workers (including, if applicable, registration and filling in the data online needed for the testing request);

- said processing is necessary to meet our legal obligations, e.g. in connection with the mandatory features of applications for testing or issuing tax documents for provision of services;
- processing is necessary for our legitimate interest, specifically consisting of:
 - concluding and performing under the contract on securing testing for workers for our contractual partner, whose contact person you are;
 - handling your questions and/or requests,
 - verifying your identity,
 - supporting our business activities, in particular by sending out electronic commercial communications to our customers or contractual partners; you have the right to object (for more information see [How can you protect yourself against direct marketing performed without your consent?](#)),
 - determining, exercising or defending (including enforcing) any legal claims of our company;
- you granted consent to the processing, in particular (i) consent to processing personal data concerning health for the purposes of keeping records of and disclosing the results of your testing, including sending a doctor's confirmation of the results, if applicable, (ii) consent to electronic sending of our newsletters and other commercial communications, if you are not our customer or contractual partner, or if you are, then you objected to this processing of your personal data in the past, and (iii) consent to setting up and maintaining an account on our website www.nutrimedlab.cz.

For what purposes do we process your personal data?

We process your personal data as set forth above for the purposes of securing or arranging testing for you or your workers and/or testing the workers of our contractual partner whose contact person you are. We may ask to check your ID card, passport or health insurance card in order to verify your identity. We can also use your e-mail address for direct marketing (in particular in the form of electronic commercial communications) (i) on the basis of our legitimate interest, if you are our customer or contractual partner, and you can object against such processing free of charge (for more see [How can you protect yourself against direct marketing performed without your consent?](#)), or (ii) on the basis of your consent, if you are not our customer or contractual partner or, if you are, then you raised an objection to this processing of your personal data in the past. If you contact us, we process your personal data for the purposes of handling your request or question. If you register on our website www.nutrimedlab.cz, we process your personal data for the purpose of setting up and maintaining your account.

Your personal data is processed by automated means as well as by our employees or contractual partners (for more see [Who is the recipient of the personal data we are processing on you as the data controller?](#)). However, our company does not use your data as set forth above to make decisions purely on the basis of automated processing including profiling pursuant to Article 22(2) of the Regulation.

Who is the recipient of the personal data we are processing on you as the data controller?

We disclose your personal data only in justified cases and in the scope absolutely necessary to the following categories of recipients:

- our contractual partners we need for our day-to-day operations or to perform under the contractual relationship with you, e.g. the laboratories performing laboratory examinations;
- other subjects in cases where required by generally binding legal regulations or as necessary to protect our legitimate interests (e.g. to courts).

Our company does not intend to disclose your personal data to a third country (non-EU member country) or international organization.

How long do we store your personal data?

We store your personal data for the duration of our contractual relationship or the contractual relationship with our contractual partner whose contact person you are, and afterwards for the limitation period on any potential related claim. However, if you only make an appointment to collect a sample for testing and do not arrive for the appointment or request to reschedule the appointment on a timely manner, in such a case we delete your personal data, except for your basic identification and contact information and payment details, after closing hours on the night after the sample was supposed to have been taken at the original appointment; your remaining, undeleted, data is then kept standardly on file for the duration of the limitation period.

We store the personal data we process on the basis of your consent (e.g. information on your health) for the period for which you granted your consent or until you withdraw your consent, if you do so before the end of that period. We store your e-mail address processed for direct marketing on the basis of our legitimate interest and not your consent for a period of three years after the end of our contractual relationship or the contractual relationship with our contractual partner whose contact person you are, unless you raise an objection to such processing (for more see [How can you protect yourself against direct marketing performed without your consent?](#)).

If you contacted us and performance under a contract or carrying out measures before entering into a contract are not involved, we will usually store your personal data for the time it takes to complete your request and thereafter for the duration of the limitation period of any related claim.

In cases where so required by binding legal regulation, we archive documents that contain your personal data for the prescribed period. We also store your personal data for the duration of any judicial disputes.

After all the periods set forth above have passed, our company destroys all your personal data, unless it is authorized/required to process said data on another legal basis.

What are your rights in processing your personal data and where can you exercise them?

You have the following rights concerning your personal data:

- Right to access: You can ask us for access to the personal data that we are processing on you. As data controller for your personal data we will also provide you with a copy of your processed personal data.
- Right to rectification: You can ask us to rectify inaccurate or incomplete personal data that we are processing on you.
- Right to erasure: You can ask us to erase your personal data in one of the following situations:
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - you withdrew the consent based on which the personal data was processed, and there are no other legal ground for the processing;
 - you objected to being the subject of a decision based on automated processing of your personal data, and there are no overriding legitimate grounds for the processing in this manner, or you objected to the processing of your personal data for the purposes of direct marketing;
 - your personal data have been unlawfully processed;
 - your personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
 - your personal data was collected in relation to the offer of information society services.

- **Right to restriction of processing:** You can ask us to restrict the processing of your personal data in one of the following situations:
 - if you contest the accuracy of your personal data, for a period enabling the controller to verify the accuracy of the personal data;
 - if the processing of your personal data is unlawful, but you oppose the erasure of the personal data and request the restriction of their use instead;
 - if our company no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims;
 - if you objected to the processing of your personal data pursuant to Article 21(1) of the Regulation, pending the verification whether the legitimate grounds of the controller override yours.
- **Right to data portability:** In cases of processing based on consent or contract and automated data processing, you have the right to acquire the personal data concerning you that you provided to us as the controller, and the right to disclose said data to another controller, in a structured, commonly used and machine-readable format; this right must not have an unfavourable effect on the rights and freedoms of other persons.
- **Right to withdraw consent:** If your personal data is processed on the basis of consent, you have the right to withdraw your consent at any time to processing your personal data for the purpose for which you granted the consent, with immediate non-retroactive effect.
- **Right to object:** You can make an objection at any time to our processing of your personal data on the basis of our legitimate interest and for the purposes of direct marketing on the basis of our legitimate interest (for more see [How can you protect yourself against direct marketing performed without your consent?](#)).
- **The right to lodge a complaint:** You have the right to make a complaint with the supervisory body, which in the Czech Republic is the Office for Personal Data Protection, address Pplk. Sochora 27, Praha 7, 170 00, Czech Republic, website: www.uoou.cz.

Exercising your rights set forth above is free of charge, unless legal regulations indicate otherwise. To exercise these rights, ask any questions or make any complaints in relation to the processing of your personal data, you can contact us at info@nutrimedlab.cz or in person / in writing at our company office, NutriMed Lab, s.r.o., Na Úbočí 1353/4, 182 00 Praha 8, Czech Republic.

Is your consent to the processing of your personal data voluntary or mandatory? Once granted, can this consent to processing your personal data be withdrawn? If so, then how/where?

Granting consent is entirely voluntary and of your own free will. You can withdraw your consent at any time once granted, with effect from that day forward, in one of the ways listed below:

- by clicking on the unsubscribe link in the electronic commercial communication sent by our company;
- by sending a withdrawal of consent to the email address info@nutrimedlab.cz;
- in person at our company office, NutriMed Lab, s.r.o., Na Úbočí 1353/4, 182 00 Praha 8, Czech Republic;
- by sending a withdrawal of consent in writing to our company office, NutriMed Lab, s.r.o., Na Úbočí 1353/4, 182 00 Praha 8, Czech Republic.

How can you protect yourself against direct marketing performed without your consent?

You have the right to object at any time the processing of your personal data for the purposes of direct marketing performed without your consent as follows:

- by clicking on the unsubscribe link in the electronic commercial communication sent by our company;

- by sending an objection to the email address info@nutrimedlab.cz;
- in person at our company office, NutriMed Lab, s.r.o., Na Úbočí 1353/4, 182 00 Praha 8, Czech Republic;
- by sending a revocation of consent in writing to our company office, NutriMed Lab, s.r.o., Na Úbočí 1353/4, 182 00 Praha 8, Czech Republic.