

## PERSONAL DATA PROCESSING POLICY

We help you to monitor the availability of medicines through the website <https://dostupnost-leku.cz/> ("**Website**"). We are Dostupnost Léků s.r.o., ID No.: 21756988, with registered office at Chudenická 1059/30, Hostivař, 102 00 Praha 10 ("**we**") and this document informs you how we process personal data and what rights you have in relation to the processing of personal data.

The processing of personal data is governed in particular by 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) ("**GDPR**").

### A. WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?

Our Website works quite simply. You can search for a medicine by location and we will show you where the medicine is available. If a medicine is listed as unavailable, you can keep an eye on its availability. If it is available, you have the option to book a pick-up at a specific pharmacy. We obtain your personal data directly from you, either through the form in which you enter your details on the Website or when you register for a user or pharmacy account. In connection with your use of our Website, we will process:

- **Identifying information**, i.e. your name, whether you are a user or a pharmacy contact person, the name of the pharmacy, the password to access your account, the address of the pharmacy and the address or area you choose as a user and where you want to check the availability of medicines as a user.
- **Contact details**, i.e. your telephone number and email address.
- **Website usage data**, i.e. technical information that we store about you when you use the Website or that we obtain from your device when you use the Website. Typically, this includes information relating to the location you have selected, where you are looking for medication, the medication identification you have entered, etc.
- **Cookie data**, i.e. data obtained from cookies and similar technologies that we use. In particular, cookies associated with device ID and selected preferences. For more information about cookies, please see the separate cookie bar. The processing of cookies is primarily an analytical activity and we will inform you if personal data should be processed.

### B. WHY DO WE PROCESS PERSONAL DATA?

We process your personal data for the following purposes:

#### B.1 Providing notifications about the availability of medicines

We primarily process your personal data to provide you with notifications about the availability of medicines. If you leave us your email address, we will monitor the availability of your medication on your behalf and send information to the email you have provided when it is available or if it is available at another pharmacy according to your location preference.

For this purpose, we process your Contact Data (email address) and Website Usage Data. After you have entered your e-mail address, we will link your Website Usage Data to the e-mail you have entered.

By entering your email address and clicking on the "*Watch*" button, a relationship in legal terms is created between us and you. The legal basis for this processing is the performance of a contract between you and us. The e-mail address will only be used for contact purposes once, at the very moment the medicine becomes available. Should anything change on your part over time, please

do not hesitate to contact us at [info@dostupnost-leku.cz](mailto:info@dostupnost-leku.cz), for example in cases where you no longer wish to receive any information about availability.

## **B.2 Booking and picking up medication**

If you are a user and wish to use the Website to book a medicine at a particular pharmacy, we will process your personal data for the purpose of processing your booking and related communication. To fulfil this purpose, we will also process your personal data if you are a representative or contact person of a pharmacy that has set up an account on the Website. In both cases, we process your personal data for the purpose of processing the reservation and related activities.

For this purpose, we process your Identification Data, Contact Data and Website Usage Data.

The legal basis for this processing is the performance of the contract between you and us and we process your data for this purpose for the time necessary to process your reservation.

## **B.3 Protecting your own legal interests**

As you may in some cases contact us with a request, complaint or other demand, we will also retain your personal data for the purposes of protecting our own legal interests.

For this purpose, we process Identification Data, Contact Data and Website Usage Data.

The legal basis for this processing is our legitimate interest. The data is processed for the period of time before information about the availability of the medicine or information about availability at another pharmacy is provided. However, we will retain the information on our system for a period of 3 years due to our legitimate interest.

## **B.4. Sending commercial communications**

We may also use your personal data to send you offers related to medicines you want to monitor the availability of or medicines you book at a particular pharmacy.

For this purpose, we process your Identification Data and Contact Data (email address).

The legal basis for this processing is either our legitimate interest, which is direct marketing, or your consent, depending on whether the commercial communication relates only to our activities related to, for example, booking or monitoring a specific medicine or to a wider range of information communicated.

We will process this personal data about you for a period of 5 years or until you opt-out of receiving commercial communications, which you can do in each individual email.

## **B.5 Website operation (a necessity)**

We process your personal data for the operation of the Website, i.e. for the presentation of the information entered in the search form, to ensure the functionality of the Website and its security.

For this purpose, we process your Website Usage Data.

The legal basis for this processing is our legitimate interest in the proper functioning and safe operation of our Website. The data is generally processed for the duration of your visit to the Website, but at most for a period of 1 year from the date of collection.

## **C. SHARING OF PERSONAL DATA**

We may share your personal data with so-called data recipients, i.e. persons to whom we transfer your personal data for processing. Specifically, these recipients are:

- the pharmacy operators where you book the medicine you want;
- a provider of storage and services related to the operation of the Website that is based in the EU;
- suppliers involved in the development and administration of the Website.

Where we share your personal data with controllers and processors in third countries (outside the European Economic Area), we only do so where there is a decision by the European Commission that a particular country outside the European Economic Area provides an adequate level of data protection, including where controllers or processors have adopted additional data protection measures such as Binding Corporate Rules (BCRs) or Standard Contractual Clauses (SCCs).

## **D. YOUR RIGHTS IN PROCESSING AND THE POSSIBILITY OF EXERCISING THEM**

Just as we have rights and obligations when processing your personal data, you have certain rights when processing your personal data as set out in the following paragraphs. The individual rights are described below.

For all questions related to the processing of your personal data, whether it is a question, exercise of rights, sending a complaint to us, etc., you can contact [info@dostupnost-leku.cz](mailto:info@dostupnost-leku.cz).

Your request will be processed without undue delay, at most within 1 month. In exceptional cases, in particular due to the complexity of your request, we are entitled to extend this period by a further 2 months. We will, of course, always inform you of any such extension and the reason for it.

### **D.1 Right of access**

You have the right to obtain confirmation from us as to whether or not we are processing your personal data.

If we process your personal data, you also have the right to request access to information about the purpose and scope of the processing, the recipients of the data, the duration of the processing, the right to rectification, erasure, restriction of processing and objection to processing, the right to lodge a complaint with a supervisory authority and the sources of personal data (this information is already provided in this document).

You can also ask us for a copy of the personal data we process. We provide the first copy free of charge; further copies may be subject to a fee. We will inform you in advance of the amount of payment. The scope of the data provided may be limited so as not to interfere with the rights and freedoms of others.

### **D.2 Right to withdraw consent**

You have the right to withdraw your consent to the processing of personal data at any time. However, the withdrawal of consent does not affect the lawfulness of the processing prior to such consent, nor does it lead to the termination of the processing of personal data that has already been anonymised. It also does not affect processing that we carry out on another legal basis.

### **D.3 Right to repair**

You have the right to request us to correct inaccurate personal data concerning you. Depending on the purpose of the processing, you may also have the right to have incomplete personal data completed, including by providing an additional declaration.

#### **D.4 Right to erasure (right to be forgotten)**

You have the right to request the deletion of your personal data in cases where we no longer need your personal data for the purposes for which it was obtained or processed; personal data is processed in violation of the law.

However, you cannot exercise this right where the processing is necessary for compliance with our legal obligations or tasks entrusted to us in the public interest or for the establishment, exercise or defence of legal claims.

#### **D.5 Right to restriction of processing**

You have the right to request the restriction of the processing of your personal data in cases where you contest the accuracy of your personal data; in this case, you may request the restriction of the processing until the accuracy of the personal data is verified; the processing is contrary to the law and you will request the restriction of the processing of your personal data instead of erasure; We no longer need your personal data for the purposes for which it was collected or processed, but you require it for the establishment, exercise or defense of legal claims; you have objected to the processing of your personal data; in this case, you may request a restriction of processing pending verification that our legitimate interests prevail.

#### **D.6 Right to portability**

You have the right to obtain a copy of your personal data that we process by automated means on the basis of your consent or for the performance of a contract. We will transmit this data in a commonly used and machine-readable format to you or to a controller designated by you, if technically feasible. The scope of the data provided may be limited so as not to interfere with the rights and freedoms of others.

#### **D.7 Right to object**

You have the right to object to the processing of your personal data that we process on the basis of our legitimate interest. We will stop processing your data if there are no other overriding reasons for processing or if the processing is not necessary for the establishment, exercise or defense of legal claims or if you object to processing for direct marketing purposes.

### **E. RIGHT TO LODGE A COMPLAINT**

In addition to exercising your rights with us, you can also file a complaint with the relevant supervisory authority, which is the Office for Personal Data Protection located at Pplk. Sochora 27, 170 00 Prague 7.

### **F. CHANGES TO THIS PROCESSING INFORMATION**

**This processing information is effective from 1 September 2023.** We are entitled to change this processing information from time to time, so please check it regularly. We will post any changes to this document on our Website.