

## TERMS AND CONDITIONS FOR THE PROTECTION OF PERSONAL DATA WHEN PROVIDING PERSONAL CARE SERVICES

### 1. WHO PROCESSES YOUR PERSONAL DATA?

When providing Personal Care Services, the Controller, i.e. the entity that processes personal data on its own behalf and under its own responsibility, is **Poliklinika VL**. In some cases, the controller may also be **Lekáreň VL** or **Výživové poradenstvo VL**, to whom personal data may be transferred as third parties in the provision of Personal Care services.

The provision of personal care services also includes the operation of a client zone within the web interface [www.vaslekar.sk](http://www.vaslekar.sk). Poliklinika VL is the operator of the part of the web interface [www.vaslekar.sk](http://www.vaslekar.sk) where clients can order personal care services and which also contains a client zone.

**Poliklinika VL operates** the client zone in the **Patient Card** and **Online Ordering** sections. These contain an overview of the services provided and an overview of client data recorded in the Poliklinika VL database. VL Polyclinic database.

The client zone also contains a section **called Medical Records**, but this **is not operated by** Poliklinika VL in order to protect clients' personal health data. This section is **operated by VL ambulancie** or **Ambulancie Poliklinika VL** as healthcare providers.

#### Information from medical records

In the **Medical Records** section of the Client Zone, you may also be given access to information from your medical records in electronic form, based on the provisions of Section 25 of Act No. 576/2004 Coll. on healthcare, services related to the provision of healthcare, and on amendments and supplements to certain acts.

### 2. WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS ABOUT YOU?

For the purposes of concluding an Agreement and the subsequent provision of Personal Care Services, we process the following personal data about you in particular:

- **Identification data:** name and surname, permanent address, password chosen by the Client for their registered account in the case of concluding the Agreement online, etc.;
- **Contact details:** telephone number and email address;
- **Birth number** for the unambiguous identification of the Client within the framework of contractual relationships;
- **Health data** necessary for the fulfillment of our contractual obligations (provision of Personal Care Services): in particular, the name of the health insurance company, the names of the attending medical staff, and the dates of examinations;
- **Employer data:** if your employer provides you with a benefit covering (part of) the cost of Personal Care Services or a discount on its price, we also process the name of your employer and the type of benefit if you decide to apply for it;
- **Information related to the website:** if you use our website to conclude a Contract for the Provision of Personal Care Services, we will also record data related to its use; the terms and conditions for the protection

of personal data when visiting the website can be found [at this link](#);

▪ **Payment information:** information about the card and cardholder, or other payment details, or account number (depending on the selected payment method).

3. **FOR WHAT PURPOSES, ON WHAT LEGAL BASIS, AND FOR HOW LONG DO WE PROCESS YOUR PERSONAL DATA?**

PURPOSE:	DETAILED DESCRIPTION:	LEGAL BASIS:	PERIOD STORAGE:
<b>CONCLUSION AND PERFORMANCE OF THE OF THE AGREEMENT</b>	<p>We process your data as a party to the Agreement for the purpose of concluding the Agreement and fulfilling our obligations arising from the Agreement, i.e. providing Personal Care services, including creating a registered account for the Client and their access to the Client Zone, verifying the Client via SMS code, etc.</p> <p>The performance of the Agreement also includes the transfer of your personal data to our Partners within the Network of Clinics based on your request.</p>	Pre-contractual relations / performance of contractual obligations pursuant to Article 6(b) of the GDPR	during the term of the Agreement (and subsequent archiving in accordance with the law, see below)
<b>PROCESSING OF HEALTH-RELATED DATA</b>	For the purposes of providing personal care services (in particular, arranging examinations on a specific date with your chosen healthcare providers), providing information about your public health insurance, etc., we process your data on the basis of your explicit consent as an exception under Article 9(2)(a) of the GDPR	express consent to the processing of health-related data pursuant to Article 6(1)(a) in conjunction with Article 9(2)(a) of the GDPR	during the term of the Agreement (and subsequent archiving in accordance with the law, see below)

<p><b>CUSTOMER SUPPORT</b></p> <p>responding to your requests and inquiries</p>	<p>You can contact us on our support line or at our customer support email address, or via the contact form. We provide customer support through our external partner. Your personal data (if you provide it to us) is processed for the purpose of answering questions and handling requests, e.g., if a technical problem has occurred during the processing of your registration, if data needs to be changed, etc.</p> <p>If you contact us by phone, the call will be recorded. If the question or request relates to a concluded contract, the legal basis for the processing of personal data is the contractual relationship resulting from the submitted request.</p> <p>Otherwise (if your request does not concern the performance of the Agreement or the conditions of its conclusion), the legal basis is our legitimate interest and the retention period for the personal data provided is shorter.</p>	<p>Pre-contractual relationships / performance of contractual obligations pursuant to Article 6(b) of the GDPR or our legitimate interest (in providing quality customer support and resolving any complaints, suggestions, and inquiries outside of concluded contractual relationships)</p>	<p>during the term of the Agreement (and subsequent archiving in accordance with the law, see below) or 1 year from the date of contact in the case of legitimate interest (if you subsequently conclude a contract with us, the data will be stored in the same way as if the basis were a contract)</p>
<p><b>MARKETING AND PROMOTIONAL PURPOSES</b></p>	<p>In order to inform you about our other services, products, offers, or news, we may send you occasional emails or SMS messages.</p>	<p>Your prior consent pursuant to Article 6(1)(a) of the GDPR</p>	<p>3 years from the date of consent or until its revocation, if you revoke your consent before the expiry of its validity.</p> <p>You can withdraw your consent at any time by contacting the Controller or by unsubscribing from the newsletter by clicking on the relevant link in each email sent to you at . Withdrawal of consent does not affect the lawfulness</p>

			of processing prior to its withdrawal.
<b>PROOF, EXERCISE OR DEFENDING LEGAL CLAIMS IN THE CASE OF JUDICIAL, ADMINISTRATIVE AND OTHER PROCEEDINGS BEFORE THE RELEVANT AUTHORITIES, INCLUDING OUT-OF-COURT DISPUTE RESOLUTION</b>	We may also process your data for the purpose of exercising or defending rights and claims in judicial, administrative, and other proceedings before the relevant authorities, including proceedings in which we must demonstrate compliance with our legal obligations.	our legitimate interest in defending or exercising our rights and claims pursuant to Article 6(1)(f) of the GDPR	after the the relevant limitation period, max. 10 years from the termination of the contractual relationship with the Client (e.g. in the case of intentional damage)
<b>COMPLIANCE WITH LEGAL OBLIGATIONS</b>	<p>We also process certain personal data for the purpose of fulfilling our legal obligations, in particular those related to accounting, tax obligations, cooperation with public authorities, handling complaints, fulfilling consumer protection obligations, etc.</p> <p>We will also process your personal data for the purpose of handling the agenda of data subjects if you contact us as a data subject and exercise your rights under personal data protection regulations.</p>	fulfilling our obligations arising from legal regulations or imposed on us on the basis of legal regulations pursuant to Article 6(1)(c) of the GDPR	for the period specified by law or determined on the basis of the law by us or by a relevant decision of a public authority, e.g. in the case of accounting documents for a period of 10 years from the year of issue of the accounting document, 5 years from the processing of a request to exercise rights under the GDPR; further retention periods may be set for the purposes of fulfilling legal obligations in the area of registry administration, etc.

<b>CCTV RECORDINGS</b>	<p>Camera systems with recording are installed on our premises to ensure the protection of monitored areas. These camera systems record the entry, movement, and activities of persons and capture their physical appearance.</p> <p>Monitoring our premises is in our legitimate interest, and you can expect such processing, as the monitored areas are marked with visible monitoring pictograms at the entrance.</p>	<p>Our legitimate interest lies in ensuring the safety and protection of property, life, and health of persons located on the Operator's premises, as well as the Operator's property, securing evidence for the investigation of offenses and crimes, providing cooperation to public authorities, and efforts to prevent</p>	<p>Records are kept for 15 days after they are made. In the event of a security incident is detected or there is another need to use them based on the legitimate interest of the Operator or the fulfillment of its legal obligations, personal data may be processed for the duration of the relevant proceedings.</p>
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Under Article 21 of the GDPR, you have **the right to object**, on grounds relating to your particular situation, to the processing of your personal data based on the legitimate interests of the Controller, and your objection will be thoroughly assessed by the Controller.

More information on how to exercise your rights under the GDPR can be found below.

The processing of personal data for the purposes of concluding and performing the Personal Care Services Agreement is necessary for these purposes, and without the provision of such data, it is not possible to conclude or perform the Agreement.

The processing of personal data on the legal basis of the fulfillment of legal obligations is a legal requirement without which the Controller is unable to fulfill its legal obligations.

Processing on the basis of legitimate interest is neither a legal nor a contractual requirement, but it results from the legitimately established legitimate interest of the Controller.

#### 4. WHO ELSE BESIDES THE VL POLYCLINIC MAY HAVE ACCESS TO YOUR DATA?

In addition to the entities listed in the main section of the Privacy Policy, your personal data may also be accessed by doctors and other medical or administrative staff of VL ambulances or VL Polyclinic Ambulances, or their Partners within the Ambulance Network.

The provision of your personal data to VL ambulancie or Ambulancie Poliklinika VL is necessary for the performance of the Contract for the Provision of Personal Care (e.g., for scheduling an examination). VL ambulances and Ambulancie Poliklinika VL will only be provided with your personal data to the extent necessary and will not exceed the scope of personal data that they have or will have at their disposal on the basis of your mutual contractual relationship for the provision of healthcare. These Partners process your personal data as third parties, i.e. independent operators, on their own responsibility and on their own

behalf, independently of the Controller.

Some of your personal data may also be accessed by other operators who are providers of certain personal care services (e.g., VL Pharmacy or VL Nutrition Counseling), who are also third parties.

We may also share some personal data with our intermediaries, i.e., entities that process personal data on our behalf and according to our instructions, such as an external accounting service, an audit and HR services provider, our website administrator, including the Client Zone, a hosting services and data center provider, external CCTV system administrator, bulk email service provider, external call center and customer support service provider, registry and archiving service providers, etc.

We do not perform automated decision-making, including profiling, with your personal data.

## 5. WHAT IS THE SOURCE OF THE PROCESSED PERSONAL DATA?

We obtain your personal data for the purposes stated here directly from you.

We obtain some personal data, such as the dates of your examinations, from your healthcare providers as part of the provision of Personal Care services, i.e., the fulfillment of our contractual obligations. If you visit our facilities in person, we may record your image and movements via a camera system.

For further information, including your rights as a data subject under the GDPR, please refer [to](#) the Privacy Policy, of which this document is an integral part. Information on how we process personal data obtained from your device or generated by our IT systems can be found in [the Privacy Policy for Website Visitors](#).

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