

PRINCIPLES OF PERSONAL DATA PROCESSING

1. Personal Data Processing Principles

The non-profit organization **MediXbank, n.o.**, with its registered office at Novozámocká 1/67, 949 05 Nitra, Slovakia, ID: 37 986 805 (hereinafter referred to as the **“Controller”**), in accordance with Regulation (EU) 2016/679 (GDPR) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the **“Regulation”**) and Slovak Act No. 18/2018 Coll. on Personal Data Protection and on amendments to certain acts (hereinafter referred to as the **“Act”**), has implemented security measures that are regularly updated. These documents define the scope and method of security measures necessary to eliminate and minimize threats and risks affecting the information system, in order to ensure:

- the availability, integrity, and reliability of management systems using state-of-the-art information technologies,
- the protection of personal data against loss, damage, theft, modification, destruction, and to maintain their confidentiality, and
- the identification of potential issues and sources of disruption and their prevention.

Contact for the responsible person (Data Protection Officer): dpo@medixbank.com

2. Personal Data Protection Principles

Your personal data will be stored securely, in accordance with the personal data retention policy, and only for the period necessary to fulfill the purpose of their processing. Access to your personal data is granted only to persons authorized by the Controller to process personal data, who process them based on the Controller’s instructions.

Your personal data will be backed up in accordance with the Controller’s retention rules. Personal data stored in backup storage are used to prevent security incidents that could arise, in particular, from security breaches or damage to the integrity of the processed data.

3. Definitions

- “personal data”** means any information relating to an identified or identifiable natural person (hereinafter referred to as the **“data subject”**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person;
- “processing”** means any operation or set of operations performed on personal data or on sets of personal data; for example, collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction, whether carried out by automated or non-automated means;
- “restriction of processing”** means the marking of stored personal data with the aim of limiting their processing in the future;
- “profiling”** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that person’s performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements;
- “information system”** means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized, or distributed on a functional or geographical basis;

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- f) **“controller”** means a natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by EU law or the law of a Member State, the controller or the specific criteria for its designation may be provided for by EU law or Member State law;
- g) **“processor”** means a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller;
- h) **“third party”** means a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
- i) **“special categories of personal data”** means categories of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person’s sex life or sexual orientation;
- j) **“genetic data”** means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from that person;
- k) **“consent of the data subject”** means any freely given, specific, informed, and unambiguous indication of the data subject’s wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them;
- l) **“personal data breach”** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed; and
- m) **“relevant and reasoned objection”** means an objection to a draft decision as to whether there is an infringement of this Regulation or whether envisaged action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free movement of personal data within the EU.

4. Purposes of Personal Data Processing

4.1. Biomedical Research

Personal data processed concerning participants in biomedical research are processed in accordance with Article 6(1)(c) of the Regulation. In the case of special categories of personal data, such data are processed pursuant to Article 9(2)(h) of the Regulation. The scope includes: *first name, last name, date of birth, national identification number, city of residence, ethnicity, somatometric indicators, examination results, and, where applicable, other health-related data or genetic and biometric data as defined by the specific research*. These personal data are subsequently retained in accordance with Slovak Act No. 395/2002 Coll. on Archives and Registries, as amended, and Slovak Act No. 576/2004 Coll. on Healthcare, Healthcare-Related Services and on the Amendment and Supplementation of Certain Acts, as amended.

4.2. Future Biomedical Research (Biobank)

The personal data processed concerning participants in biomedical research are processed pursuant to Article 6(1)(a) of the Regulation. In the case of special categories of personal data, such data are processed pursuant to Article 9(2)(a) of the Regulation. The scope includes: *first name, last name, date of birth, national identification number, city of residence, ethnicity, somatometric indicators, examination results, and, where applicable, other health-related data or genetic and biometric data as defined by the specific*

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4.3. Record of Requests

Personal data processed via contact forms on our website and through emails are processed solely for handling your request. By completing and submitting a request, you consent to the processing of personal data in accordance with Article 6(1)(a) of the Regulation. The scope of processed personal data includes: *first name, last name, permanent residence address, telephone number, and email address*. Personal data will be retained only until the purpose for which they were processed has been fulfilled. Where retention periods must be observed under applicable legal regulations, the retention period is governed by Act No. 395/2002 Coll. on Archives and Registries. No transfer of personal data to third countries takes place. Personal data will not be used for automated individual decision-making, including profiling.

4.4. Processing of Accounting Documents

Processing is necessary to comply with a legal obligation of the Controller pursuant to Article 6(1)(c) of the Regulation. The scope of processed personal data includes: *title, first name, last name, residential address, telephone number, bank account number, email address, and signature*. These personal data are subsequently stored in accordance with Act No. 395/2002 Coll. on Archives and Registries, as amended.

The joint controller is **ZAR Services, s. r. o.**, Company ID: 35 943 076.

4.5. Complaints Register

Personal data of data subjects who seek protection of their rights or legally protected interests, or who point out specific shortcomings, particularly violations of legal regulations requiring intervention by a competent authority, are processed in accordance with Article 6(1)(c) of the Regulation. The scope of processed personal data includes: *first name, last name, permanent residence address, telephone number, email address, and signature*. These personal data are subsequently retained for a period of 5 years.

4.6. Debt Collection

In the case of debt collection, personal data are processed in accordance with Article 6(1)(c) of the Regulation. The scope of processed personal data includes: *title, first name, last name, residential address, telephone number, and email address*. These personal data are subsequently stored in accordance with Act No. 395/2002 Coll. on Archives and Registries, as amended.

4.7. Enforcement Proceedings

Processing of personal data is necessary to comply with a legal obligation of the Controller pursuant to Article 6(1)(c) of the Regulation. The scope of processed personal data includes: *title, first name, last name, national identification number, and residential address*. These personal data are subsequently stored in accordance with Act No. 395/2002 Coll. on Archives and Registries, as amended.

4.8. Job Applicants Register

Processing of personal data of job applicants is carried out based on consent pursuant to Article 6(1)(a) of the Regulation, which is provided by the applicant. The Controller will contact only successful applicants. Personal data are retained for a period of 12 months from the granting of consent. No transfer of personal data to third countries takes place. Personal data will not be used for automated individual decision-making, including profiling. The data subject has the right to withdraw their consent at any time before the expiry of the above period by sending a request to the email address: dpo@medixbank.com or by sending a written request to the Controller's address with the wording "*GDPR withdrawal of consent*" indicated on the envelope. The Controller declares that in the event of a written request by the data

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subject to terminate the processing of personal data before the specified period, the data will be deleted within 30 days from the receipt of the withdrawal of consent.

The joint controller is **ZAR Services, s. r. o.**, Company ID: 35 943 076.

4.9. Register of Supplier and Customer Representatives

Personal data processed about data subjects are processed on the basis of the Controller's legitimate interests pursuant to Article 6(1)(f) of the Regulation.

The scope of processed personal data includes: title, first name, last name, job position, service classification, functional classification, employee identification number, department, place of work, telephone number, fax number, email address, and employer identification data.

These personal data are subsequently retained for a period of 10 (ten) years after the termination of the contract or business relationship.

The joint controller is **ZAR Services, s. r. o.**, Company ID: 35 943 076.

5. Rights of the Data Subject

- 5.1. Right to Withdraw Consent** – in cases where we process your personal data based on your consent, you have the right to withdraw that consent at any time. You may withdraw your consent electronically, via the contact details of the authorized person, in writing by means of a notice of withdrawal of consent, or in person at the Controller's registered office. Withdrawal of consent does not affect the lawfulness of the processing of personal data carried out on the basis of that consent prior to its withdrawal.
- 5.2. Right of Access** – you have the right to obtain a copy of the personal data we hold about you, as well as information on how we use your personal data. In most cases, your personal data will be provided to you in written paper form, unless you request another method of delivery. If you request this information by electronic means, it will be provided to you electronically, where technically feasible.
- 5.3. Right to Rectification** – we take reasonable measures to ensure that the information we hold about you is accurate, complete, and up to date. If you believe that the data we hold are inaccurate, incomplete, or outdated, please do not hesitate to ask us to correct, update, or supplement this information.
- 5.4. Right to Erasure (Right to be Forgotten)** – you have the right to request that we erase your personal data, for example where the personal data we collected about you are no longer necessary for the original purpose of processing. However, your right must be assessed in light of all relevant circumstances. For example, we may have certain legal and regulatory obligations, which means that we may not be able to comply with your request.
- 5.5. Right to Restriction of Processing** – in certain circumstances, you are entitled to request that we stop processing and using your personal data. This includes, for example, situations where you believe that the personal data we hold about you may be inaccurate, or where you believe that we no longer need to use your personal data.
- 5.6. Right to Data Portability** – in certain circumstances, you have the right to request that the personal data you have provided to us be transferred to another third party of your choice. However, the right to data portability applies only to personal data that we have obtained from you on the basis of your consent or under a contract to which you are a party.
- 5.7. Right to Object** – you have the right to object to the processing of personal data that is based on our legitimate interests. If we do not have compelling legitimate grounds for the processing and you submit an objection, we will no longer process your personal data.

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If you believe that any personal data we hold about you are incorrect or incomplete, please contact us.

If you wish to object to the manner in which we process your personal data, please contact our Data Protection Officer by email at: dpo@medixbank.com

or in writing at:

MediXbank, n.o.

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949 05 Nitra

Slovakia

Our Data Protection Officer will review your objection and will work with you to resolve the matter.

If you believe that your personal data are being processed unfairly or unlawfully, you may lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, with its registered office at Park One Building, Námestie 1. mája 18, 811 06 Bratislava, Slovakia; phone number: +421 2 3231 3214; email address: statny.dozor@pdp.gov.sk; website: <https://dataprotection.gov.sk>

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