Information on data processing in relation to data subjects' requests (the "Memorandum")

Introduction

Dear,

This Memorandum is to inform you as **data subjects** (applicant) on the principles and procedures applicable to the processing of your personal data and on your rights related to the processing of this data, in accordance with 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/ES (General Data Protection Regulation; hereinafter the "**GDPR**") and in accordance with Act No. 110/2019 Coll., on Processing of Personal Data, as amended (hereinafter the "**PDPA**").

the company **Health Uncompromised a.s.**, company reg. No. 23163551, having its registered office at náměstí Marie Schmolkové 3493/1, Strašnice, 100 00 Praha 10, entered in the Commercial Register under file No. B 29634 /MSPH (the "**Controller**") respects transparent and fair processing of your personal data and its appropriate protection according to the applicable legislation to ensure correct and fair processing. We protect your personal data with the highest security to prevent any unauthorized or accidental access to, destruction, loss, unauthorized transmissions, or unauthorized processing of your personal data. For this purpose, we comply with the relevant technical and organisational measures to ensure an appropriate level of security with respect to all possible risks. Persons who handle personal data are obliged to maintain confidentiality of the information obtained in connection with the processing of this data.

As personal data protection terms and abbreviations are used in this Memorandum, we have included an explanation of these terms and abbreviations in section **'List of selected terms and abbreviations'** in order to make the content of this Memorandum as clear and comprehensible as possible.

List of selected terms and abbreviations

TERM/ABBREVIATION	DEFINITION
Personal data	Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, **directly or indirectly**, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Special categories of personal data	Personal data revealing racial or ethnic origin, political opinions, religion or philosophical beliefs or trade union membership, and processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning health or data concerning a natural person's sex life or sexual orientation.
Data subject	The natural person to which the personal data relates. A data subject is deemed to be identified or identifiable if, based on one or several personal data, the data subject's identity can be directly or indirectly determined.
Controller	The natural or legal person, public authority, agency or another body, which, alone or jointly with others, determines the purposes and means of processing of personal data.
Processing	**Any** operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Purpose of processing	The objection and purpose of the Controller's activity
Means of processing	The tools and processes selected for specific processing of personal data.
Legal ground	The condition without which the processing of personal data is **not in any case possible**.
Processor	A natural or legal person, public authority, agency or another body which processes personal data on behalf of the Controller.
Recipient	A natural or legal person, public authority, agency or another body to which the personal data is disclosed, whether a third party or not. The Recipient has the legal, contractual or other authority to process personal data. These are other controllers or processors, such as tax, administrative or regulatory authorities. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with the Member State law shall not be regarded as recipients; the processing of that personal data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Third party	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.
OPDP	The **Office for Personal Data Protection** is the supervisory authority under the PDPA. The competences of the central administrative authority related to personal data protection to the extent provided for in the PDPA and other competences laid down in a special law are assigned to the OPDP.
Cookies	Small text files that enable a website to remember important information that makes its use easier for users. The legal ground for technical or functional cookies is legitimate interest. The legal ground for other cookies is consent. Further information is available on the Controller's website.

Processing of personal data of website visitors

Please note that when using the website and submitting your content, personal data may be processed. Through this Memorandum, we provide you with information about such processing.

Cookies

As the Controller's website uses cookies to ensure the basic functionality of the website as well as for marketing, personalisation and analytics purposes, you may manage cookies via the cookie management system ("cookie banner").

By clicking the "settings" symbol in the website footer, you may reopen the cookie banner and modify your previous choice, including for specific categories of cookies or purposes of processing, which are always properly described therein.

Social Media Plugins

The controller informs you about the use of social media plugin features on its website. When you visit a website, your browser establishes a direct connection to the corresponding social network server from which the plugin (button) is loaded. In such a case, the social network provider becomes aware that the respective page on the website has been visited.

If you wish to prevent this, please log out of your social media accounts before visiting our website. Please also note that social network providers may set cookies if you have not disabled the acceptance and storage of cookies in your browser settings.

Below are instructions on how to change settings in the most commonly used web browsers. Simply click on the desired browser:

- Chrome
- Firefox
- Internet Explorer
- Opera
- Safari iOS

Individual plugins used

LinkedIn	LinkedIn Ireland Unlimited Company Information on personal data protection can be found on the company's website.
WhatsApp	Meta Platforms (WhatsApp) Information on personal data protection can be found on the company's website.

Data subjects

Website visitors.

Processed personal data

The Controller and the Processor processing personal data on behalf of the Controller process, depending on the relevant legal ground and purpose of processing, in particular the following categories of personal data:

• identification and authentication data: name, surname, nickname;
• electronic data: IP address, pixel ID, device type, unique device identifier, browser type, operating system.

Source of the personal data being processed

The Controller obtains your personal data directly from you.

Purpose, duration and legal basis for the processing of personal data

Purpose of processing	• creation of records and enabling downloads of their content; • purposes for which website visitors provide personal data
Legal ground	• legitimate interest pursuant to Article 6 (1)(f) GDPR; • consent pursuant to Article 6 (1)(a) GDPR.

Consent granted by you will be archived for the entire duration for which your consent is granted and for 5 years after its withdrawal for the purpose of demonstrating that the processing of personal data was lawful. The legal ground for such archiving is legitimate interest pursuant to Article 6 (1)(f) GDPR.

Manner and means of processing

The Controller and the Processor processing personal data on behalf of the Controller process your personal data by automated means, for example through the Processor Complianz B.V. Kalmarweg 14-5 9723JG Groningen Netherlands Website: https://complianz.io Email: support@complianz.io Phone number: +31 50 211 2779 Further information on cookies is available at https://cookiedatabase.org/.

When processing your personal data by automated means, the Controller does not apply automated individual decision-making, including profiling, that might affect your rights.

Processors

Your personal data is processed by the Controller's employees who require access to personal data for the performance of their work duties and who are bound by confidentiality.

Your personal data may also be accessed by employees of the Processor, only to the extent necessary for the performance of their activities for the Controller. The Controller always concludes a written data processing agreement with its Processors in accordance with Article 28 GDPR.

Categories of processors – Activities

IT service provider	Provider of the cookie and consent management tool – Complianz B.V.

Transfer of personal data to third countries

The Controller and the processors acting on the Controller's behalf process your personal data primarily in the Czech Republic or in the European Union (EU), where unified data protection is guaranteed in each member state. Quite exceptionally, your personal data may be processed outside the EU, for example, in a computer system whose servers are located outside the EU. In that case, we would select a contractual partner that will meet the conditions for secure data transfer in accordance with the applicable legislation. We will inform you in an appropriate manner about the specific measures and procedures, about to whom and to which countries your personal data is disclosed/transferred, under which conditions, how your data is protected, and about the risks involved.

Rights of data subjects

- If the processing of personal data is based on your consent, you have the right **to withdraw your consent at any time**. In connection with the withdrawal of consent, the Controller informs you **that the withdrawal of consent does not affect the lawfulness of the processing of personal data until its withdrawal**, nor the processing of data for other legal reasons for which your consent is not required.
- You have the right to request **access** to your personal data and more detailed information about its processing.
- You have the right to have your inaccurate or incomplete personal data **rectified**.

- You have the right to **receive** your personal data in a commonly used and machine-readable format, allowing it to be transferred to another controller if we have obtained it on the basis of your consent or in connection with the conclusion and performance of a contract and it is processed by automated means.
- You have the right to **object** to the processing of some or all of your personal data.
- You have the right to ask us **to delete** your personal data if there is no other legal ground for the processing.
- You have the right to lodge **a complaint** with the OPDP.
- You have the right **not to be subject** to automated individual decision making, including profiling.

Updates to the Memorandum

As the rules and conditions for the processing and protection of your personal data may change, in particular as a result of changes in legislation, or our terms, procedures and methods of processing and protecting your personal data may change, we will inform you of such changes by updating this Memorandum, unless such change requires contacting you directly. This Memorandum was last updated on 2. 9. 2026.

Data Protection Officer

Health Uncompromised a.s. has appointed a Data Protection Officer. Contact details for the Data Protection Officer: **milena.segecova@epholding.cz.**

Exercise of data subject rights

Where you submit **a request** to exercise your rights as set out in the section entitled **'Data Subject Rights'** of this memorandum, the controller is **always obliged** to deal with such a request from the data subject and must provide the information without undue delay upon receipt of the request, and in any event **within one month of receiving the request. In exceptional cases,** this period **may** be extended by two months, in which case the data controller must inform the data subject of this, including the reasons for such an extension.

You may send your request:
a. in writing to the address náměstí Marie Schmolkové 3493/1, Strašnice, 100 00 Prague 10
b. to the Data Protection Officer, whose contact details are: Health Uncompromised a.s., **Data Protection Officer, náměstí Marie Schmolkové 3493/1, Strašnice, 100 00 Prague 10 or**
by email to milena.segecova@epholding.cz

To make it easier to exercise your rights, you may use the template form marked **'Data Subject Request**'.

If you have reasonable grounds to **suspect** that there has been a breach of the law in relation to the protection of personal data**, you have the right to lodge a complaint with the Office for Personal Data Protection, Pplk. Sochora 727/27, 170 00 Prague 7-Holešovice, email:**stiznosti@uoou.cz ; for this purpose, you may use the form available on the Office for Personal Data Protection's website https://uoou.gov.cz/verejnost/stiznost-na-spravce-nebo-zpracovatele.