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**").

Our company 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.

Controller

The Controller of your personal data is 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**") who is responsible for discharging the obligations under the applicable data protection laws.

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.

Processed personal data

The Controller and the processor that processes personal data on behalf of the Controller, process, with regard to the relevant legal ground and purpose of processing, in particular the following personal data: name, surname, permanent address, telephone, e-mail, handwritten signature, electronic signature, subject of the application.

Failure to provide the personal data necessary to verify the identity of the applicant will prevent the assessment or processing of the request. The applicant is obliged to provide only correct and up-to-date personal data.

Source of the personal data being processed

The Controller obtains your personal data **primarily from you.**

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

Purpose of processing	Legal basis	Duration of processing[1]
Processing of personal data in relation to data subjects' requests	Compliance with a legal obligation according to Article 6 (1, c) GDPR	For 5 years from the processing of the request

Manner and means of processing

The Controller and the processor processing personal data on behalf of the Controller process your personal data by **manual** means (such as by placing a request in paper form in the relevant file) and by **automated** means (by means of ICT, such as a personal computer using Microsoft Office 365 applications, as well as the Controller's or processor's systems).

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

Recipients of personal data

The Controller may, in certain circumstances, transfer your personal data to recipients (other controller, processor) and third parties.

Personal data may be disclosed to the following recipients: contractors with the controller, in particular for the provision of legal services, administrative, telecommunications and technical support services for the purpose of supporting, managing and developing the information system and conducting external audits. In addition, personal data may be disclosed to public authorities in accordance with specific regulations.

However, where public authorities require personal data in the framework of a particular inquiry, they are not considered to be recipients but **third parties**.

Transfer of personal data to third countries

[1] *In determining the adequacy of the duration of processing of personal data, the following aspects are taken into account (i) limitation periods, (ii) probability of legal claims, (iii) probability and significance of the risks involved, and (v) any recommendations of supervisory authorities*

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.