

PERSONAL DATA PROTECTION TERMS FOR THE PROVISION OF PERSONAL CARE SERVICES

1. WHO PROCESSES YOUR PERSONAL DATA?

In the provision of Personal Care Services, the Controller, that is, the entity processing personal data on its own behalf and under its responsibility, is **Poliklinika VL**. In certain instances, the Controller may also be **Lekáreň VL** or **Výživové poradenstvo VL**, which may transfer personal data to third parties in connection with the provision of Personal Care Services.

The operation of the client zone within the web interface at [ia www.vaslekar.sk](http://www.vaslekar.sk). Poliklinika VL acts as the controller of the section of the web interface at [ia www.vaslekar.sk](http://www.vaslekar.sk), where clients may order Personal Care Services and which also includes the client zone.

Poliklinika VL serves as the administrator of the client zone in the sections **Patient Record** and **Online Booking**. These sections provide an overview of the services offered as well as a summary of the client information recorded in the Poliklinika VL database.

The client zone also includes a section titled **Medical Documentation**. However, Poliklinika VL **does not administer** this section, in order to safeguard clients' personal health data. **The administrator** of this part is **VL Clinics** or **Poliklinika VL Clinics**, as providers of healthcare services.

Information from Medical Documentation

Within the **Medical Documentation** section of the client zone, it is possible for you to access information from your medical documentation in electronic form, pursuant to the provisions of § 25 of Act No. 576/2004 Coll. on Healthcare, Services Related to the Provision of Healthcare, and on Amendments to Certain Acts.

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

For the purpose of entering into the Agreement on the Provision of Personal Care Services and the subsequent provision of those services, we process the following categories of personal data concerning you:

- **Identification Data:** first and last name, permanent residence address, password selected by the Client for their registered account if the Agreement is concluded online, and similar information;
- **Contact Details:** telephone number and email address;
- **Personal Identification Number** for unambiguous identification of the Client within contractual relations;
- **Health Information** required to fulfill our contractual obligations (provision of Personal Care Services): specifically, the name of the health insurance provider, names of attending healthcare professionals, and appointment dates;
- **Employer Information:** If your employer provides a benefit covering (part of) the cost of Personal Care Services or a discount on such services, we will also process the name of your employer and the type of benefit, should you choose to claim it;
- **Information Related to the Website:** If you use our website to conclude a Personal Care Services Agreement, we will also record data related to your use of the site; the terms of personal data protection applicable when visiting the website can be found at the following link:[that this link;](#)

- **Payment Information:** details concerning the card and cardholder, as well as other payment data or account number, depending on the selected payment method.
- **Voucher-Related Information:** the Customer's name and surname (recipient), voucher identification number, information regarding the purchased type of service, and the validity date of the voucher.

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

PURPOSE:	DETAILED DESCRIPTION:	LEGAL BASIS:	DURATION OF RETENTION:
CONCLUSION AND PERFORMANCE OF CONTRACT FOR THE PROVISION OF PERSONAL CARE SERVICES	<p>Information about you as a contracting party</p> <p>We process the contract for the purpose of concluding and fulfilling our obligations arising from the Contract, i.e. providing personal care services, including creation of a registered account for the Client and their access to the Client Zone, verification of the Client via SMS code, etc., as applicable.</p> <p>Performance of the Contract also includes the transfer your personal data to our Partners within the Network of Clinics upon your request.</p>	<p>pre-contractual relationships / fulfillment of contractual obligations</p> <p>in accordance with Art. 6, Section 1, Letter b) of the GDPR regulation</p>	<p>for the duration of the Contract's validity (and subsequent archiving as required by law, see below)</p>
PROCESSING OF DATA RELATED TO HEALTH	<p>For the purpose of providing services in the field of personal care (in particular arranging examinations for a specific date with your chosen providers of healthcare services), providing information regarding your public health insurance, insurance, and similar matters, we process based on your explicit consent as an exception under Article 9(2)(a) of the GDPR regulation</p>	<p>explicit consent for the processing of data related to health under Article 6(1) point (a) in conjunction with Article 9(2)(a) of the GDPR regulation</p>	<p>for the duration of the Contract's validity (and subsequent archiving as required by law, see below)</p>
VOUCHER MANAGEMENT	<p>Processing Customer data for the purpose of issuing a Voucher, its registration, verifying identity upon redemption, and protecting against misuse (duplicate redemption).</p>	<p>Legitimate interest under Article 6(1) point (f) GDPR (identification of the authorized person and prevention of fraud).</p>	<p>For the duration of the Voucher's validity (max. 4 months)</p>

<p>CLIENT SUPPORT</p> <p>answering your requests and inquiries</p>	<p>You can contact us on our line support or email address client support, or via contact form. Customer support we provide through our external partner. Your personal data (if you provide it to us) is processed for the purpose of answering questions and meeting requests, e.g. if a technical problem occurred during processing your registration, if the need to change data, etc.</p> <p>If you contact us via telephone line, the telephone will be recorded. If the question of whether the request concerns a concluded contract, legal basis for processing personal data is a contractual relationship resulting from the submitted application.</p> <p>Otherwise (unless your request does not relate to the performance of the Contract or conditions of its conclusion) is legal based on our legitimate interest and retention period of the provided personal data is shorter.</p>	<p>pre-contractual relations / fulfillment of contractual obligations</p> <p>obligations under Art. 6(b) GDPR regulations or our legitimate interest (which providing quality client support and solutions possible complaints, suggestions and inquiries outside closed contractual relations)</p>	<p>during the duration validity of the Contract (and subsequent archiving within the meaning of the law, see below) or 1 year from performed contact in case authorized interest (if with us) then you close contract, the data will be kept the same as in the case if based on the contract)</p>
<p>MARKETING AND PROMOTIONAL PURPOSES</p>	<p>In order to inform you about our other services, products, we can provide you with offers or news send occasional emails, or SMS messages.</p>	<p>your previous one consent according to Article 6 paragraph 1 letter a) GDPR regulations</p>	<p>3 years from the date of award consent or to his/her appeal, if You withdraw your consent before upon the expiration of its term validity.</p> <p>You have your consent. possibility at any time to withdraw by contacting Operator or by logging out from newsletter subscription by clicking on relevant link mentioned in each sent email. Withdrawal of consent</p>

			does not affect the legality of processing prior to its withdrawal.
<p>DEMONSTRATION, EXERCISE OR DEFENSE OF LEGAL CLAIMS IN THE EVENT OF</p> <p>JUDICIAL, ADMINISTRATIVE, OR OTHER PROCEEDINGS BEFORE COMPETENT AUTHORITIES, INCLUDING ALTERNATIVE DISPUTE RESOLUTION</p>	<p>We may also process your data for the purpose of exercising or defending legal rights and claims in the event of judicial, administrative, or other proceedings before the competent authorities, including proceedings in which we are required to demonstrate compliance with our legal obligations.</p>	<p>our legitimate interest in defending or exercising our rights and claims as per Article 6 paragraph 1, letter f) of the GDPR regulation</p>	<p>for the duration of the applicable limitation period, maximum of 10 years from the termination of the contractual relationship with the Client (e.g. in the event of intentional damage caused)</p>
<p>FULFILLMENT OF LEGAL OBLIGATIONS</p>	<p>Certain personal data are also processed in order to fulfill our legal obligations, particularly those related to accounting, tax obligations, cooperation with public authorities, handling complaints, fulfillment of obligations in the area of consumer protection, etc.</p> <p>Your personal data will also be processed for the purpose of handling matters concerning the rights of affected individuals, should you contact us as an affected individual and exercise your rights arising from personal data protection regulations and related legislation.</p>	<p>fulfillment of obligations arising for us from legal regulations or imposed on us based on legal requirements in accordance with Article 6(1)(c) of the GDPR</p>	<p>for the period stipulated by law or determined on the basis of the law by us or by the competent decision of a public authority for example in the case of accounting documents for a period of 10 years from the year of issuance of the accounting document, 5 years from processing the request for exercising rights under the regulation GDPR; additional retention periods may be set to fulfill the needs of meeting legal obligations in the area of records management, etc. records management, and similar matters.</p>

CAMERA RECORDINGS

Camera systems with recording capabilities are installed within our premises.

These surveillance systems are equipped to record activities within the monitored areas.

They are implemented to ensure the protection of the monitored premises, and these camera systems record the entry, movement, and actions of individuals and capture their physical appearance.

The monitoring of our premises serves our legitimate interest, and such processing may be reasonably expected, as the monitored areas are clearly marked at the entrance with visible pictograms indicating surveillance.

our legitimate interest consists in ensuring safety, protection of property, as well as the lives and health of individuals

located within the premises of the Operator, as well as the property of the Operator, securing evidentiary materials for clarification of offenses and criminal acts, providing cooperation to public authorities and efforts toward prevention

the records are retained for a period of 15 days from their creation. In the event of detection of a security incident or other for the purposes of exercising them on the basis of legitimate interest of the Controller or for fulfilling its legal obligations personal data may be processed until for the duration of the relevant proceedings.

Pursuant to 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 carefully considered by the Controller.

Further information regarding the exercise of your rights under the GDPR can be found below.

The processing of personal data for the purposes of concluding and fulfilling the Agreement on the Provision of Personal Care Services is essential for these purposes, and without providing such data, it is not possible to conclude or perform the Agreement.

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

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

4. WHO, IN ADDITION TO POLYCLINIC VL, MAY HAVE ACCESS TO YOUR DATA?

In addition to the entities specified in the main section of the Personal Data Protection Terms, your personal data may also be accessed by physicians and other medical or administrative staff of VL ambulances or Polyclinic VL ambulances, as well as their Partners within the Network of Ambulances.

The provision of your personal data to VL ambulances or Polyclinic VL ambulances is necessary for the fulfillment of the Agreement on the Provision of Personal Care (e.g., to schedule an examination). VL ambulances and Polyclinic VL ambulances will be provided with your personal data only to the extent strictly necessary and will not exceed the scope of data which they possess or will possess based on your mutual contractual relationship concerning the provision of healthcare services. These Partners process your personal data

as third parties, that is, independent controllers, who act on their own behalf and responsibility, independently of the Controller.

Certain other controllers, who serve as providers of specific personal care services (for example, VL Pharmacy or VL Nutrition Consulting), and who are likewise third parties, may also have access to some of your personal data.

We may also share certain personal data with our processors, which are entities that process personal data on our behalf and in accordance with our instructions, such as external accounting services, providers of audit and human resources services, administrators of our website including the Client Zone, hosting service and data center providers, external administrators of the camera system, providers of mass email distribution services, external providers of call center and customer support services, records management and archiving service providers, among others.

We do not engage in automated decision-making, including profiling, with respect to your personal data.

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

For the purposes stated herein, we obtain your personal data directly from you. In instances where you are a Customer for whom a Voucher was purchased, your identification data (name and surname) were provided by the Purchaser who ordered and paid for the Voucher.

Please be advised that if a Customer exercises the **right to erasure** of personal data prior to redeeming a Voucher, the Voucher shall become invalid without entitlement to compensation, as the processing of the name is an essential condition for verifying eligibility to access services, due to the Voucher's non-transferable nature.

Certain personal data, such as the dates of your medical examinations, are obtained from your healthcare providers in connection with the provision of Personal Care services, in fulfillment of our contractual obligations. Should you personally visit our facilities, your likeness and movements may be recorded via our camera system.

Additional information, including your rights as a data subject under the GDPR, may be found [in the Personal Data Protection Terms, which form an integral part of this document. Details regarding the processing of personal data obtained from your device or generated by our IT systems are available in the Personal Data Protection Terms for Website Visitors.](#)

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