

DATA PROCESSING TERMS

These Data Processing Terms are issued 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 (hereinafter referred to as the “**GDPR**”) and Act No.110/2019 Sb., on the processing of personal data (hereinafter referred to as the “**Act**”) for the purpose of fulfilling the information duty of Click2Claim, s.r.o., ID No. 28791215, with the registered office at Jičínská 1748/5, Vinohrady, 130 00 Prague 3, registered in the Commercial Register of the Metropolitan Court in Prague under file no. C 218874 (hereinafter referred to as “**C2C**”) within the meaning of Articles 13 and 14 of the GDPR.

A. CONTROLLER OF YOUR PERSONAL DATA

C2C processes your personal data as the

- **controller** if you purchased TravelMedik from C2C directly or through a C2C partner;
- **processor** authorized by the controller, whereas the controller of your personal data is the company from which you purchased TravelMedik.

For more information on the status of individual entities in the processing of your personal data relating to your use of TravelMedik, please do not hesitate to contact us using the contact details below.

B. PURPOSES AND LEGAL BASIS FOR PROCESSING

We process your personal data in order to allow your use of TravelMedik in accordance with Article 6(1)(b) of the GDPR.

We may also use the personal data of our direct customers, to a proportionate extent, to inform them about new developments in the services we provide in accordance with Article 6(1)(f) of the GDPR.

Your personal data may also be processed via cookies on our website in accordance with Article 6(1)(f) of the GDPR. In this case, you will be entitled to configure cookies directly using the so-called cookie bar, which will be displayed after you visit our website.

C. RECIPIENTS OF PERSONAL DATA

Your personal data will be received by the controller, processor and provider of health services, i.e. eSanitas s.r.o., ID No. 19756372, with the registered office at Rybná 716/24, 110 00 Prague 1, registered in the Commercial Register of the Metropolitan Court in Prague under file No. C 391122.

Personal data may also be disclosed to persons who provide data processing services to C2C (IT entities, providers of the marketing platform through which newsletters and other commercial communications are sent, debt recovery lawyers, external accountants). We will vet all such persons to ensure they provide sufficient safeguards with respect to the confidentiality and protection of your personal data. We will enter into written contracts with these persons obliging them to protect your personal data and to adhere to our data security standards, as well as to maintain confidentiality.

In justified cases, personal data may also be disclosed to the relevant public authorities or similar institutions (e.g. tax authorities, banks, insurance companies, courts, prosecuting authorities).

D. PERSONAL DATA CATEGORIES

We process personal data to the extent of the name, surname, date of birth, email address, phone number, ID, the time period for which TravelMedik is active.

E. TRANSFERS TO NON-EU AND NON-EEA COUNTRIES

Your personal data will not be transferred to countries outside the EU and EEA. Should this be strictly necessary in connection with your use of TravelMedik, such transfer will be subject to your explicit consent.

F. DATA RETENTION PERIOD

C2C will process the personal data for the duration of provision of TravelMedik and for as long as necessary to comply with legal obligations and defend rights in any disputes, but no longer than 5 years after the termination of TravelMedik.

G. YOUR RIGHTS RELATED TO PERSONAL DATA PROCESSING

You have the following rights in relation to the processing of your personal data:

- **Right of access to your personal data**

- You have the right to request information about whether your personal data are processed, for what purpose, to what extent, for how long they will be stored, the source of your personal data, whether automated decision-making, including profiling, is involved in the processing of your personal data. You also have the right to request a copy of your personal data. First copy will be provided free of charge.
- **Right to rectification of your personal data**
 - If your personal data are inaccurate or incomplete, you can request their rectification or completion at any time.
- **Right to erasure of personal data (right to be forgotten)**
 - If (i) your personal data are no longer necessary for the purposes for which they were processed, (ii) the processing is unlawful, (iii) you object to the processing and there are no overriding legitimate grounds for the processing, (iv) if the Controller is under a legal obligation to do so and there is no other legitimate interest of the Controller in the processing, the Controller must delete your personal data.
- **Right to restriction of processing of personal data**
 - If any controversy arises in connection with the processing of your personal data, the controller must restrict their processing to the extent that such personal data may only be stored and, where appropriate, may be used to establish or exercise legal claims.
- **Right to object to personal data processing**
 - You have the right to object to the processing of your personal data for direct marketing purposes or for legitimate interest. If processing for direct marketing purposes is objected to, personal data will no longer be processed for these purposes.
- **Right to portability of personal data**
 - Where automated processing of personal data is carried out based on a contract or your consent, you have the right to receive the data in a structured, commonly used and machine-readable format.
- **Right to withdraw consent to the processing of personal data**
 - You have the right to withdraw your consent to the processing of personal data at any time. This will not affect the processing of personal data that took place before the withdrawal of consent.
- **Right to lodge a complaint with the supervisory authority**
 - If you believe that there has been a violation of data protection rules during data processing, you have the right to lodge a complaint with the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7

You can exercise the above rights with C2C, regardless of whether C2C is a data controller or a data processor, by mail to the address of C2C's registered office or by email to the data processing contact gdpr@click2claim.eu. Where appropriate, C2C will forward your request to the controller of your personal data and will inform you of this. However, you may exercise the above rights directly with the controller of your personal data.

H. NO AUTOMATED DECISION-MAKING, PROFILING

Personal data of natural persons are not subject to any decision based solely on automated processing, including profiling, at C2C.

I. PERSONAL DATA SOURCES

C2C obtains personal data directly from you or from your business partner who has arranged TravelMedik for you. We believe in good faith that the business partner will always process personal data in accordance with the GDPR and the Act, and that the data will be up-to-date, accurate and true, and will be relevant to the stated purpose of the processing. Should this not be the case, please inform us so that we can address the problem.

J. PERSONAL DATA PROTECTION MEASURES

Our databases are secured against access by third parties and login data is encrypted with a strong algorithm. Our employees are not able to view your login credentials.

K. INQUIRIES

If you have any questions or complaints in relation to the processing of your personal data, please contact us by mail at C2C's registered office address or by email to the data processing contact gdpr@click2claim.eu.