



REITENBERGER

SPA MEDICAL

Rules for processing clients' personal data

The company Reitenberger s.r.o. with its registered office at Michelská 300/60, Prague 4 (hereinafter also referred to as the "Administrator") processes some personal data of its clients. The purpose of this document is to provide you with information regarding what personal data we collect, how we handle them, from what sources we obtain them, for what purposes we use them, to whom we may disclose them and where you can obtain the information about your personal data that we process.

Reitenberger, as a personal data administrator, follows the personal data processing rules described below. When processing the personal data of its clients, it complies with and follows the applicable legal regulation of the European Parliament and the European Council 2016/679 concerning the protection of natural persons with regard to the processing of personal data and the information of data subjects (hereinafter "GDPR") and the subsequent Czech directives, regulations and rules on the protection of personal data, as amended.

Sources of personal data:

- directly from the data subjects,
- contractual partners (travel agencies, online accommodation portals, et al.),
- publicly accessible registers, lists and records (e.g. commercial register, business register, land register, public telephone directory, etc.)

Personal data are processed to the extent that the data subject has provided them to the administrator in connection with the establishment of a contractual or other legal relationship with the administrator, or which the administrator has otherwise collected and processed in accordance with effective law regulations or to fulfill the administrators' legal obligations.

The personal data are in particular:

- identification and descriptive data - personal data serving to uniquely and unmistakably identify a person (name, surname, title, date of birth, personal identification number, permanent address, identity card number - ID card, passport number or other similar documents, Company identification number, VAT identification number),
- descriptive data (e.g. bank details),
- other data necessary for the performance of the contract,
- contact details (e-mail address, telephone number)

Given the contractual nature of the relationship between the administrator and the client, the disclosure of personal data is entirely voluntary. However, the administrator would not be able to enter into a contract with the client and fulfill the obligations arising from that contract, unless it is provided the necessary personal data for the establishment of the contract and the provision of services.

Categories of data subjects:

- customer of the administrator,
- an employee of the administrator,
- carrier,
- service provider,
- visitor, et al. persons moving in the premises of the administrator, which are monitored by the camera system,
- any other person who is in a contractual relationship with the administrator,
- a job applicant.

Categories of recipients of personal data:

- financial institutions,
- public institutions,
- processor (e.g. IT service provider),
- government, et al. authorities in the framework of the performance of their legal obligations under the relevant legislation (foreign police, municipality),
- other recipients (e.g. transfer of personal data abroad - EU countries),
- contractors providing selection procedures for vacancies,
- with the client's consent or upon the client's instructions, personal data may also be provided to other entities (e.g. delegates).

Purpose of the processing of personal data:

- fulfillment of legal obligations by the administrator (in particular the Act on the Residence of Foreigners, the Act on Population Registration, the Act on Local Fees),
- contractual negotiations,
- performance of the contract,
- archiving conducted based on the law,
- purposes contained in the data subject's consent (e.g. marketing purposes),
- selection procedures for vacancies,
- protection of the rights of the administrator, the recipient or other persons concerned (e.g. recovery of claims of the administrator),
- protection of the vital interests of the data subject.

The processing of personal data is conducted by the administrator. The processing is conducted at the administrators' premises, branches and headquarters by individual authorized employees of the administrator or by the processor. The processing is conducted by using computer technology or, in the case of personal data in paper form, manually, in accordance with all security principles for the management and processing of personal data. The administrator declares that the personal data it processes are under constant control and that it has modern controlling, technical and security mechanisms in place to protect the processed data against unauthorized access or transfer, against their loss or destruction, as well as against other possible misuse. All entities to whom personal data may be

disclosed shall respect the right to privacy of the data subjects and shall comply with applicable data protection legislation. All persons who come into contact with clients' personal data in the course of their work or contractual duties are bound by a legal or contractual duty to confidentiality.

All personal data processed by the administrator are processed for the time necessary to fulfill the rights and obligations arising both from the contractual relationship and from the relevant legislation or to fulfill the stated purpose.

The client has the right to:

- access their personal data,
- the correction or deletion of their personal data,
- restriction of the processing of their personal data,
- the transferability of their personal data,
- object to the processing of their personal data.

At the client's request, without undue delay, the administrator shall provide the client with information about what personal data the administrator processes about the client and shall deliver it to the client personally unless another method of delivery has been explicitly agreed upon. For an unjustified and unreasonable request, the administrator is authorized to charge a fee that accounts for the administrative costs of providing the requested information.

The details are specified in the applicable legislation.

The administrator does not process clients' personal data for the purpose of profiling without their consent.

General Information

You can access our website without actively providing any information about your identity. Unless you prevent it yourself or unless you use software that blocks such information, your internet browser installed on your device usually transmits only general technical information to our website server, which allows for the connection to the website (e.g., browser type and version, operating system, device host name, language settings, date and time, or duration of access, visited content, referring websites). This also includes the IP address of the device you are currently using to visit the website. This data is temporarily stored in a log file.

Cookies

We use "cookies" on our website, which are small text files that store information related to the specific device you are using. Cookies serve various purposes. Many cookies are necessary for the proper functioning of the website's technical features (e.g., shopping cart or video display).

Other cookies are used to provide a user-friendly environment on our website. For example, we use "session cookies" that serve to identify whether you have previously visited specific pages on our website. We also use cookies to record statistics about the usage of our website and to improve our offering. These cookies allow us to

automatically recognize that you have previously visited us when you return to our site. In some cases, cookies may also be stored on your device by third-party companies (so-called third-party cookies) for the purposes mentioned above.

The processing of data using cookies is necessary for the protection of our legitimate interests and the interests of third parties in accordance with Article 6(1)(f) of the General Data Protection Regulation (GDPR). Most browsers automatically accept cookies. However, you can configure your browser to not store any cookies on your computer or to always inform you before a new cookie is saved.

Furthermore, we use cookies for measuring internet reach and for advertising and marketing purposes, partly in the form of third-party cookies (see the description of the Google Analytics service below). When accessing our website, you will be asked for consent to the use of cookies. The use of cookies and the processing of the corresponding data are exclusively based on your active consent and on the basis of Article 6(1)(a) of the GDPR and § 15 of the German Telemedia Act, which must be interpreted in accordance with European law.

Google Analytics

We use Google Analytics service on our website, including Universal Analytics and Google Analytics 4, which is a web analytics service provided by Google. The Google Analytics service uses third-party cookies.

Information generated by the cookies regarding the use of our website (such as the IP address of the accessing computer, access time, URL referral, and information about the browser and operating system used) is usually transmitted to and stored on Google servers in the United States.

When using Google Analytics 4, we also utilize the User-ID and Google Signals features.

User-ID: User-ID enables us to assign unique and persistent IDs to individual sessions (and activities within those sessions) and analyze user behavior across different devices.

Google Signals: The Google Signals service collects additional information if the user enables the personalization of Google's advertising services on their device. This information may include anonymous advertising device identifiers (AAID) or advertising identifiers for mobile applications (IDFA). Google combines data from Google Signals with data from Google Analytics accounts whenever possible.

In this way, Google can analyze user behavior across different devices and use this information to personalize its services.

Your IP address is truncated before being transmitted to the United States on our website. This ensures the anonymization of the IP address. Based on data processing agreements our company has concluded with Google Inc., Google is authorized to process data obtained through the Google Analytics service and evaluate this data on our behalf.

This statement is publicly available on the website of the administrator.

The client may contact the personal data administrator with their suggestions, e.g. by e-mail to: tomas.barak@reitenberger.cz