

# Statement of Masaryk Memorial Cancer Institute on the processing of personal data

pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in connection with the processing of personal data and on the free movement of such data and on the repeal of Directive 95/46/EC (General Data Protection Regulation, GDPR).

This statement is addressed in particular to patients, employees, contractual partners, collaborators and all other persons whose personal data are processed by the Masaryk Memorial Cancer Institute (MMCI) in connection with the subject of its activities.

In this statement, the MMCI provides you with basic information about the processing of personal data and about your rights related to the processing of your personal data.

We protect your personal data to the maximum extent possible corresponding with the technical level of the means used and the likely risks to your rights and freedoms. There are strict rules in the MMCI stipulating who can have access to your personal data and what personal data they can process.

We would like to ask you to read the information below carefully. If something is not clear enough for you, we will be happy to explain any concept to you. If you do not agree with the scope or processing of your personal data, you can take the steps listed below to protect your rights.

We establish high standards of personal data protection which also apply to children to an unchanged extent. We ask you as the child's legal or other representative, to clearly inform the child about the processing of his personal data as well as about his rights related to it.

**Name and address of the Controller:**

Masaryk Memorial  
Cancer Institute

Žlutý kopec 7  
656 53 Brno  
The Czech Republic

IČO: 00209805;  
DIČ: CZ00209805  
Tel: 543 13 4102, 4103  
e-mail: [direct@mou.cz](mailto:direct@mou.cz)

**Data Protection Officer:**

You may contact our  
Data Protection Officer  
as follows:

Jaroslav Jordán  
e-mail: [dpo@mou.cz](mailto:dpo@mou.cz)

Specific information on what personal data MMCI processes, for what purposes, on which legal basis, for which period and other information can be found at [www.mou.cz](http://www.mou.cz) in section „Dokumenty“ – “GDPR a Ochrana osobních údajů” or you can contact our Data Protection Officer (DPO) for more specific information.

# Contents

What personal data MMCI processing? _____	5
Who can be recipients of personal data? _____	7
From whom or from where does MMCI obtain personal data? _____	7
What rights as a data subject do you have? _____	8
Do you want to withdraw your consent of personal data? _____	13
How to apply your rights to MMCI? _____	14
Do you have an interesting suggestion or comment for us? _____	16

# What personal data does MMCI process?

## Personal Data:

- **identification and address data:** academic degree, first name, last name, social security number, insurance number, date of birth, address of permanent residence, contact address, data on identity documents, place of birth, social security number etc.);
- **electronic contact information:** telephone number, e-mail address, ID of other platform etc.
- **Other electronic data:** IP address, authentication certificates, identifiers in social networks and communication platforms, location data, etc.
- **Other data:** image record, previous employment, job position, number of children, education, knowledge, health insurance company, salary, personal document number, bank details, analytical data
- **Data about other data subjects:** data about family members (children, wife/husband etc.)

## Sensitive Personal Data:

- **Data concerning health:** all data related to the health status of the data subject, which indicate the past, present or future physical or mental health of a natural person, including data on the provision of health services, which relate to his state of health. This includes information about a given natural person collected during registration for the purpose of providing health services and provision of health

services to the natural person concerned, a number, symbol or specific data assigned to a natural person for the purpose of unique identification for healthcare purposes, information obtained during the provision of health services, including genetic data and biological data, and any information about, for example, disease, disability, risk of disease, medical history, clinical treatment or physiological or biomedical condition of the data subject, regardless of their origin.

- **Genetic Data:** personal data relating to the inherited or acquired genetic characteristics of a certain natural person, which result from the analysis of the biological sample of the natural person in question, in particular chromosomes or deoxyribonucleic acid (DNA) or ribonucleic acid (RNA) or from the analysis of another element that makes it possible to obtain equivalent information;
- **Biometric Data:** personal data resulting from specific technical processing relating to the physical or physiological characteristics or behavioral characteristics of a natural person, which enables or confirms unique identification;
- **Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership.**

# Who can be recipients of personal data?

Personal data could be available to:

- **Employees of MMCI:** Only to the authorized employees for the legitimate purposes of their work,
- **Data Processors:** Processing by a processor is governed by a specific contract
- **Processor out of EU or EEA:** Processing by a processor out of EU or EEA is governed by specific appropriate safeguards (for example standard contractual clauses approved by European Commission),
- **Other legitimate subjects:** For the fulfillment of the obligations arising from relevant legal regulations or if it is necessary to protect the rights of MMCI
- **Educational institutions,**
- **Contract partners:** Processing is necessary for the performance of the contract.

# From whom or from where does MMCI obtain personal data?

We collect personal data:

- Directly from natural person (data subject),
- By MMCI's CCTV,
- From publicly accessible registers, lists, records (e.g. commercial or trade register);

- From internally accessible registers, lists, records (e.g. medical documentation, database of concluded contracts);
- From internal information systems/applications (e.g. hospital information system);
- From contractual partners;
- From participants in procurement procedures;
- From other sources (e.g. business cards, identification bracelets)

## What rights as a data subject do you have?

We process your personal data in accordance with the legal and internal regulations we have adopted to ensure the protection of your personal data. We process your personal data transparently.

**If you want to have an overview of the data we process about you:**

You have the right to access the data and other related information, such as:

- processing purposes,
- categories of personal data concerned,
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period,
- all available information on sources of personal data, if not obtained from the data subject,
- your rights to request from us the correcti-

on (rectification) or erasure of your personal data or the restriction of its processing or to object to such processing;

- your right to file a complaint with a supervisory authority;
- the fact that automated decision-making takes place, including profiling;
- in the case of providing personal data to third countries or an international organization, you have the right to information about appropriate safeguards (see Art. 46 GDPR) that apply to the transfer.

You have **the right to obtain** from us the **first copy** of your personal data that we process about you free of charge. However, we may charge a reasonable fee for additional copies based on administrative costs. However, your right to obtain a copy of your personal data shall not affect the rights and freedoms of others.

**If you believe that your data is incorrect or inaccurate:**

You have **the right to have your data corrected or supplemented**.

**If you have provided us with personal data on the basis of consent or on the basis of a contract and the processing is carried out automatically:**

You have **the right to transfer** personal data (right to data portability) in a **structured, commonly used and machine-readable (OCR) format**. If it is technically possible, we will transfer your data to another personal data controller. We may not carry out the transfer if the rights and freedoms of other persons could be adversely affected.

**If you do not have information about the recipients to whom MMCI provides personal data**

You have the right to ask MMCI for **information about the recipients** to whom MMCI has disclosed your personal data.

If you believe that MMCI or its processors or joint controllers or recipients or third parties are processing your personal data in such a way that is in conflict with the protection of your private and personal life or which violates legal regulations or does not correspond to the purpose of the processing, you can claim remedies using all the means provided to the data subject by applicable legislation, in particular you have:

**Right to erasure  
(right to be  
forgotten)**

You can exercise the right if:

- our processing is illegal,
- is unauthorized because the purpose of the processing has expired,
- you revoked your consent to processing,
- your objection to the processing was by us evaluated as legitimate,
- we have not deleted personal data according to legal obligations given to us.

If the above-mentioned reasons are given, the MMCI will delete your personal data without undue delay. However, the MOÚ may not comply with your request for erasure if it considers that the above-mentioned reasons are not given or if the processing is necessary for reasons mentioned in the provisions of Article 17, paragraph 3 of the GDPR

**The right to obtain  
restriction of  
the processing/  
blocking of your  
personal data**

You can exercise the right if:

- you request the restriction of processing of your personal data , in case your personal data is inaccurate (blocking will be carried out for the duration of MMCI verification),
- the processing is illegal and you do not require deletion of personal data,
- MMCI does not need your personal data

(however, you require it for the exercise and defense of legal claims),

- you have exercised the right to raise an objection according to Article 21 paragraph 1 of the GDPR.

If the processing of your personal data is restricted, your personal data will be processed (with the exception of the processing which consists of storage in MMCI only) only with your consent or for the purpose of determining, exercising and defending legal claims, for the protection of the rights of another person or for the reason of an important public interest of the EU or its member state.

### Right to object

You can apply the right if:

- processing is carried out by MMCI in public interest or in the exercise of public authority,
- the processing is necessary for the purposes of the legitimate interests of MMCI or third parties, including profiling based on such processing.

If we use your personal data for the purpose of direct marketing, you have the right to object to the processing at any time and we will comply. You have the right to raise an objection even if we process your personal data for the purposes of scientific research or for statistical purposes and the reason is your specific situation. However, MMCI may not comply with your request to exercise the right to object if the processing is necessary for the fulfillment of MMCI's task in the public interest (e.g. protection of public health).

**The right to file a complaint with the supervisory authority**

If you are dissatisfied with the resolution of your rights and you believe that the processing of the personal data by MMCI violates them and GDPR.

**The Office for Personal Data Protection** is the authorized supervisory authority for monitoring the implementation of the GDPR in the Czech Republic with the aim of protecting the basic rights and freedoms of natural persons in connection with the processing of their personal data.

A complaint can also be filed with the supervisory authority of another EU member state, namely at your place of habitual residence, the place of your employment or the place where you believe the breach of GDPR occurs.

# Do you want to withdraw your consent of personal data?

In cases where MMCI requires your consent to process your personal data, you are entitled to withdraw this consent at any time. Withdrawal of consent does not affect the legality of the processing of your personal data based on consent prior to the date of its withdrawal. Withdrawal of consent does not affect the processing of personal data for other legal reasons, such as compliance with legal obligations, legitimate interests of MMCI, etc. You have the option of withdrawing your consent in the same way as you gave it.

To withdraw your consent to the processing of personal data, you can use the sample form that you can find at [www.mou.cz/en](http://www.mou.cz/en) in the section Personal Data Protection→ Form for exercising the rights of the data subject.

# How to apply your rights to MMCI?

## **Verbally:**

(not by phone) at any MMCI workplace or at the Data Protection Officer. Verbal submission of the request will be confirmed at the MMCI workplace with a written record, and the relevant MMCI employee will ask you to prove your identity by presenting an identity card, passport or, for example, a driver's license.

## **In writing:**

through the MMCI office, indicate the Data Protection Officer as the recipient of the mail.

## **Electronic:**

via the electronic address [dpo@mou.cz](mailto:dpo@mou.cz) (a guaranteed electronic signature based on a qualified certificate for an electronic signature, or a qualified electronic signature is required).

## **Further information on exercising data subject rights:**

If possible, we will provide you with information about the action taken on your request within one month of receiving it. This deadline can be extended by two months if the processing is complicated or due to the large number of applications. You will be informed in time about the extension of the deadline, including the justification. If we have any doubts about your

identity, we may ask you to provide additional information necessary to confirm your identity. If we conclude that the requests will be manifestly unreasonable or unreasonable, particularly if they are repeated, we may charge a reasonable processing fee, or we may refuse to comply with the request.

You can find specific information on methods of exercising the rights of data subjects at [www.mou.cz/en](http://www.mou.cz/en) in the section Personal Data Protection→ Form for exercising the rights of the data subject.

# Do you have an interesting suggestion or comment for us?

Do not hesitate to contact us at any time with any suggestion, reminder about the processing of personal data in MMCI or even with a warning about a possible violation of the principles of processing personal data or the set system for their protection. You should also notify us if you feel that MMCI is not fulfilling its obligations, your data has been leaked or someone has obtained unauthorized access to your data, please let us know as soon as possible.

Please send specific suggestions, comments or warnings about a possible violation of the personal data processing policy or the set system for their protection to the MMCI Data Protection Officer at e-mail [dpo@mou.cz](mailto:dpo@mou.cz)

This Statement is continuously modified to keep it up-to-date, the current version is available on the website [www.mou.cz/en](http://www.mou.cz/en)

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Thank you.

Masaryk Memorial  
Cancer Institute

