



PRIVACY NOTICE

01.01.2025

(A) This Notice**Summary – This Notice**

We take the protection of your Personal Data very seriously! This Notice explains how we may Process your Personal Data. This Notice may be amended or updated from time to time, so please check it regularly for updates.

This Notice is issued by Jiří Jurajda on behalf of itself (“**Jiří Jurajda**” “**me**”, “**we**”, “**us**” and “**our**”), and is addressed to individuals outside our organization with whom we interact, including customers, visitors to our Sites, and other users of our products or services (together, “**you**”). Defined terms used in this Notice are explained in Section (T) below.

For the purposes of this Notice, Jiří Jurajda is the Controller. Contact details are provided in Section (S) below.

This Notice may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Notice carefully, and to regularly check this page to review any changes that we might make in accordance with the terms of this Notice.

(B) Collection of Personal Data**Summary – Collection of Personal Data**

We may collect or obtain Personal Data about you: directly from you (e.g. where you contact our assistance services and call centers); in the course of our relationship with you (e.g. if you make a purchase); when you make your Personal Data public (e.g. if you make a public post about us on social media); when you visit our Sites; when you register to use any of our Sites, products, or services. We may also receive Personal Data about you from third parties (e.g. from databases of contact details of Health Care Professionals).

Collection of Personal Data: We may collect Personal Data about you from the following sources:

- Data That You Provide: We may obtain your Personal Data when you provide it to us (e.g. if you contact one of our call centers, we might Process Personal Data that you provide to our operators or our representatives when they visit you, or if you contact us by e-mail or by other means).
- Data That a Third Party Provides: We may collect or obtain your Personal Data from third parties who provide it to us.
- Relationship Data: We may collect or obtain your Personal Data in the ordinary course of our relationship with you (e.g. we provide our products to you or to your employer, or if you or your employer supply products or services to us and we keep Personal Data related to this relationship).
- Data That You Make Public: In some cases, we may collect or obtain your Personal Data that you manifestly choose to make public, including *via* social media (e.g. we may collect information from your social media profile(s), if you make a public post about us).
- Site Data: We may collect or obtain your Personal Data when you visit any of our Sites or use any features or resources available on or through a Site.

(C) Creation of Personal Data**Summary – Creation of Personal Data**

We may create Personal Data about you (e.g. records of your interactions with us).

We may also create Personal Data about you, such as records of your interactions with us, and details of your purchase history or your preferences.

(D) Categories of Personal Data That We May Process**Summary – Categories of Personal Data That We May Process**

We may Process: your personal details (e.g. your name); demographic data (e.g. your age); your contact details (e.g. your address); records of your consents; purchase details; payment details (e.g. your billing address); information about adverse effects of medication related to you;

information about our Sites (e.g. the type of device you are using); details of your employer (where relevant); information about your interactions with our content or advertising; any views or opinions you provide to us.

We may Process the following categories of Personal Data about you:

- Personal Details: Given name(s); preferred name; and photograph.
- Demographic Information: Gender; date of birth/age; nationality; salutation; title; and language preferences.
- Contact Details: Correspondence address; shipping address; telephone number; e-mail address; details of Personal Assistants, where applicable; messenger app details; online messaging details; and social media details.
- Consent Records: Records of any consent you may have given, together with the date and time, means of consent and any related information (e.g. the subject matter of the consent).
- Payment Details: Invoice records; payment records; billing address; payment method; bank account number; accountholder name; account security details; BACS details; SWIFT details; IBAN details; payment amount; payment date; and records of checks.
- Details about Profession and Specialization: Specialization, profession or professional affiliation and preferences of Health Care Professionals.
- Data relating to reputation and financial background: capital links, financial conditions, offences and convictions, contact and bank details of suppliers and customers.
- Data Relating to Our Sites: Device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Site; username; password; security login details; usage data; aggregate statistical information.
- Employer Details: Where you interact with us in your capacity as an employee, the name, address, telephone number and e-mail address of your employer, to the extent relevant.
- Content and Advertising Data: Records of your interactions with our online advertising and content, records of advertising and content displayed on pages displayed to you, and any interaction you may have had with such content or advertising (including mouse hover, mouse clicks, any forms you complete (including incomplete forms not submitted) and any touchscreen interactions.
- Views and Opinions: Any views and opinions that you choose to send to us, or publicly post about us on social media platforms.

(E) Legal Basis for Processing Personal Data

Summary – Legal Basis for Processing Personal Data

We may Process your Personal Data where: you have given your prior, express consent; the Processing is necessary for a contract between you and us; the Processing is required by applicable law; or where we have a valid, legitimate interest in the Processing.

In Processing your Personal Data in connection with the purposes set out in this Notice, we may rely on one or more of the following legal bases, depending on the circumstances:

- Consent: We may Process your Personal Data where we have obtained your prior, express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);
- Contractual Necessity: We may Process your Personal Data where the Processing is necessary in connection with any contract that you may enter into with us, e.g. we will rely on this legal basis if we deliver goods to you, or if we would be sending you letters in relation to our contracts;
- Compliance with Applicable Law: We may Process your Personal Data where the Processing is required by applicable law; e.g. we may have a legal duty to retain information about adverse effects of

medication, in which case we will retain information about any adverse effects of medication about which you informed us through our call service or otherwise; or

- **Legitimate Interests:** We may Process your Personal Data where we have a legitimate interest in the Processing. The balancing test that we conduct in each case is as follows:
 - We ensure that the Processing is lawful, proportionate, and conducted in accordance with the terms of this Notice;
 - We ensure that we have a legitimate business need to perform the Processing; and
 - We ensure that there is no material likelihood of any adverse impact on your interests, fundamental rights, or freedoms, as a result of the Processing.

(F) Sensitive Personal Data

Summary – Sensitive Personal Data

We do not seek to collect or otherwise Process your Sensitive Personal Data.

We do not seek to collect or otherwise Process Sensitive Personal Data in the ordinary course of our business.

If you provide Sensitive Personal Data of any other data subject to us, you must ensure that it is lawful for you to disclose such data to us, including ensuring that one of the legal bases set out above is available to us with respect to the Processing of those Sensitive Personal Data.

(G) Purposes For Which We May Process Your Personal Data

Summary – Purposes For Which We May Process your Personal Data

We may Process your Personal Data for the following purposes: providing products and services to you; submission to the European Database of adverse effects of medication; compliance with applicable legal obligations; improving our products and services; ensuring the safety of our customers; operating our Sites; communicating with you; managing our IT systems; financial management; conducting surveys; ensuring the security of our premises and systems; conducting investigations where necessary; and improving our Sites.

We may Process your Personal Data for the following purposes, subject to applicable law:

- **Provision of Products and Services:** Providing our products, services, or Sites; providing products and services on request; providing promotional items upon request; and communicating with you in relation to those products and services. This may include, e.g. our Processing of your data in order to ship goods that you have bought, in order to send you an invoice, etc.
- **Compliance with Laws and Regulations:** Adhering to our numerous legal obligations, such as keeping track of contradictions of our medications; keeping your medical files for these regulatory purposes; using this documentation in case of investigation by relevant authorities or in some other interaction with public authorities.
- **To Improve Services for Our Customers:** We may use your Personal Data to improve our services; to offer you more relevant goods; to present you with better offers.
- **To Provide Customer Service:** To provide you with the best service possible; to help you with any issues or problems; to recommend our services and goods.
- **To Confirm Your Eligibility:** If some of our products or content is only aimed at certain group of our customers (e.g. Health Care Professionals), we have to Process your Personal Data to see if you are eligible.
- **Compliance Checks:** Fulfilling our regulatory compliance obligations, including 'Know Your Client' checks; and confirming and verifying your identity (including by using credit reference agencies); and screening against government and/or law enforcement agency sanctions lists and other legal restrictions.

- Our Sites: Operating and managing our Sites; providing content to you; displaying advertising and other information to you; communicating and interacting with you *via* our Sites; and notifying you of changes to any of our Sites, our products, or our services.
- Communications: Communicating with you *via* any means (including *via* e-mail, telephone, text message, social media, post or in person), with news items and other information in which you may be interested, subject to ensuring that such communications are provided to you in compliance with applicable law; maintaining and updating your contact information where appropriate; and obtaining your prior, opt-in consent where required.
- Communications and IT Operations: Management of our communications systems; operation of IT security systems; and IT security audits.
- Financial Management: Sales; finance; corporate audit; and vendor management.
- Surveys: Engaging with you for the purposes of obtaining your views on our products and services.
- Security: Physical security of our premises (including records of visits to our premises; and CCTV recordings); and electronic security (including login records and access details).
- Investigations: Detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.
- Legal Proceedings: Establishing, exercising and defending legal rights.
- Improving Our Sites, and Products: Identifying issues with our Sites, or our products; planning improvements to our Sites, or our products; and creating new Sites, or products.

(H) Disclosure of Personal Data to Third Parties

Summary – Disclosure of Personal Data to Third Parties

We may disclose your Personal Data to: legal and regulatory authorities; our external data Processor and subcontractors of our Processor; our external advisors; any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; any purchaser of our business; and any third-party providers of advertising, plugins or content used on our Sites.

We may disclose your Personal Data to other entities, for legitimate business purposes (including operating our Sites, and providing products and services to you), in accordance with applicable law. A full list of my entities that may have access to the Personal Data is available in Section (S) below.

In addition, we may disclose your Personal Data to:

- you and, where appropriate, your appointed representatives;
- legal and regulatory authorities, when obliged to do so by law or by command of a relevant authority, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) take measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

(I) Profiling

Summary – Profiling

The Processing of your Personal Data may include automated decision-making, including Profiling.

The Processing of your Personal Data may include automated decision-making, including Profiling, which is carried out for the following purposes:

Profiling Activity

Logic of Profiling Activity

Consequences for You

Profiling of Health Care Professionals	We analyze our interactions with Health Care Professionals in order to contact them with the most relevant products and in order to provide the most useful offers for them.	If you are a Health Care Professional, this might affect prices that we charge you, and it might affect the content of our offers for you.
Customized Discounts	We analyze the purchasing activity and interests of our customers. This information is analyzed to determine the most appropriate promotions and discounts to offer our customers.	If you are our direct customer, this Profiling activity may mean that you receive discounts that are not available to others, and that others receive discounts that are not available to you.

(J) International Transfer of Personal Data

Summary – International Transfer of Personal Data

We may transfer your Personal Data to recipients in other countries. Where we transfer Personal Data from the EEA to a recipient outside the EEA that is not in an Adequate Jurisdiction, we do so on the basis of Standard Contractual Clauses.

Because of the international nature of our business, we may need to transfer your Personal Data within me, and to third parties as noted in Section (H) above (notably to subcontractors of our data Processor, Genpact), in connection with the purposes set out in this Notice. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located. Typically these transfers would be either to the U.S. or India.

Where we transfer your Personal Data from the EEA to recipients located outside the EEA who are not in Adequate Jurisdictions, we do so on the basis of Standard Contractual Clauses. You may request a copy of our Standard Contractual Clauses using the contact details provided in Section (S) below.

Please note that when you transfer any Personal Data directly to me, entity established outside the EEA, we are not responsible for that transfer of your Personal Data. We will nevertheless Process your Personal Data, from the point at which we receive such data, in accordance with the provisions of this Notice.

(K) Data Security

Summary – Data Security

We implement appropriate technical and organizational security measures to protect your Personal Data. Please ensure that any Personal Data that you send to us are sent securely.

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information *via* the Internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the Internet – any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us is sent securely.

(L) Data Accuracy

Summary – Data Accuracy

We take every reasonable step to ensure that your Personal Data is kept accurate and up-to-date and is erased or rectified if we become aware of inaccuracies. Please let us know if your Personal Data that we keep is inaccurate or not up-to-date.

We take every reasonable step to ensure that:

- your Personal Data that we Process is accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that is inaccurate (having regard to the purposes for which it is Processed) is erased or rectified without delay.

From time to time, we may ask you to confirm the accuracy of your Personal Data. You can always contact us with a request to rectify or erase inaccurate Personal Data. For more details, please see the section about your legal rights.

(M) Data Minimization

Summary – Data Minimization

We take every reasonable step to limit the volume of your Personal Data that we Process to what is necessary.

We take every reasonable step to ensure that your Personal Data that we Process is limited to the Personal Data reasonably necessary in connection with the purposes set out in this Notice.

(N) Data Retention

Summary – Data Retention

We take every reasonable step to ensure that your Personal Data is only retained for as long as it is needed in connection with a lawful purpose.

We take every reasonable step to ensure that your Personal Data is only Processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the duration for which we will retain your Personal Data are as follows:

(1) We will retain copies of your Personal Data in a form that permits identification only for as long as:

- (a) we maintain an ongoing relationship with you (e.g. when you order goods from us, when we provide you with any services, or when we have a long-term, on-going relationship); or
- (b) we are obliged by law to keep your Personal Data (e.g. about adverse effects of medication, your medical data and other records); or
- (c) your Personal Data is necessary in connection with the lawful purposes set out in this Notice (e.g. when you contact our assistance services and we have a legitimate interest in Processing such data in order to provide you with the most valuable help and in order to improve our products and services),

plus:

(2) the duration of:

- (a) any applicable limitation period (i.e. any period during which any person could bring a legal claim against us in connection with your Personal Data, or any authority can initiate legal proceedings in which your Personal Data may be relevant); and
- (b) an additional two (2)-month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that is relevant to that claim, or if any authority initiates proceedings, we will still possess relevant documentation),

and:

- (3) in addition, if any relevant legal claims are brought or any other legal procedure is initiated, we may continue to Process your Personal Data for such additional periods as are necessary in connection with that claim or such proceedings.
-

During the periods noted in paragraphs (a) and (b) above, we will restrict our Processing of your Personal Data to the storage of, and maintaining the security of, such data, except to the extent that such data needs to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data; or
- anonymize the relevant Personal Data.

(O) Your Legal Rights

Summary – Your Legal Rights

Under applicable law, you may have a number of rights, including: the right not to provide your Personal Data to us; the right of access to your Personal Data; the right to request rectification of inaccuracies; the right to request the erasure, or restriction of Processing, of your Personal Data; the right to object to the Processing of your Personal Data; the right to have your Personal Data transferred to another Controller; the right to withdraw consent; and the right to lodge complaints with Data Protection Authorities. We may require proof of your identity before we can give effect to these rights.

Subject to applicable law, you may have a number of rights regarding the Processing of your Relevant Personal Data, including:

- the right not to provide your Personal Data to us (however, please note that we may be unable to provide you with the full benefit of our Sites, our products, or our services, if you do not provide us with your Personal Data – e.g. we may not be able to process your orders without the necessary details);
- the right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of such Relevant Personal Data;
- the right to request rectification of any inaccuracies in your Relevant Personal Data;
- the right to request, on legitimate grounds:
 - erasure of your Relevant Personal Data; or
 - restriction of Processing of your Relevant Personal Data;
- the right to object, on legitimate grounds, to the Processing of your Relevant Personal Data by us or on our behalf, especially in case of direct marketing;
- the right to have certain Relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- where we Process your Relevant Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- the right to lodge complaints regarding the Processing of your Relevant Personal Data with a Data Protection Authority (in particular, the Data Protection Authority of the EU Member State in which you live, or in which you work, or in which the alleged infringement occurred, each if applicable).

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Notice, or about our Processing of your Personal Data, please use the contact details provided in Section (S) below. Please note that:

- we may require proof of your identity before we can give effect to these rights;
- where your request requires the establishment of additional facts (e.g. a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take; and
- where our processing is based on our legal duties, we might not be able to accommodate your request.

(P) Cookies and Similar Technologies

Summary – Cookies and Similar Technologies

We may Process your Personal Data by placing or reading Cookies and similar technologies.

When you visit a Site, we may place Cookies (a small data file) onto your device, or read Cookies already on your device, subject always to obtaining your consent, where required, in accordance with the law. We use Cookies to record information about your device, your browser and, in some cases, your preferences and browsing habits. This might include our analysis of the ways visitors engage with our sites in order to improve your experience, to provide you with more relevant content and offer you more relevant goods.

We may Process your Personal Data through Cookies and similar technologies.

(Q) Terms of Use

Summary – Terms of Use

Our <http://www.ibill.cz> govern all use of our Sites.

All use of our Sites, our products, or our services is subject to our <http://www.ibill.cz>. We recommend that you review our Terms of Use regularly, in order to review any changes that we might make from time to time.

(R) Direct Marketing

Summary – Direct Marketing

We may Process your Personal Data to contact you with information regarding products or services that may be of interest to you. You may unsubscribe for free at any time.

We may Process your Personal Data to contact you *via* e-mail, telephone, direct mail or other communication formats to provide you with information regarding products or services that may be of interest to you. If we provide products or services to you, we may send information to you regarding our products or services, upcoming promotions and other information that may be of interest to you, using the contact details that you have provided to us and always in compliance with the law.

You may unsubscribe from our promotional e-mail list at any time by simply clicking on the unsubscribe link included in every promotional e-mail that we send. Once you unsubscribe, we will not send you further promotional e-mails, but we may continue to contact you to the extent necessary for the purposes of any products or services you have requested.

(S) Contact Details

Summary – Contact Details

You may contact us via post – telephone, or e-mail.

If you have any comments, questions or concerns about any of the information in this Notice, or any other issues relating to the Processing of Personal Data carried out by us, or on our behalf, please contact:

Jiří Jurajda

ID: --

e-mail: jiri.jurajda@ibill.cz**Data protection officer:**Name: **not established**e-mail: jiri.jurajda@ibill.cz**(T) Definitions**

- **“Adequate Jurisdiction”** means a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.
- **“Cookie”** means a small file that is placed on your device when you visit a website (including our Sites). In this Notice, a reference to a “Cookie” includes analogous technologies, such as web beacons and clear GIFs.
- **“Controller”** means the entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- **“Data Protection Authority”** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **“EEA”** means the European Economic Area.
- **“Personal Data”** means information that is about any individual, or from which any individual is directly or indirectly identifiable, 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 individual.
- **“Process”, “Processing” or “Processed”** means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **“Processor”** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **“Profiling”** means any form of automated Processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular, to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.
- **“Relevant Personal Data”** means Personal Data in respect of which we are the Controller.
- **“Sensitive Personal Data”** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.
- **“Standard Contractual Clauses”** means template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.
- **“Site”** means any website operated, or maintained, by us or on our behalf.

(U) List of the joint data controllers

Country	Name and address of the joint data controllers	Registration Number
---------	--	---------------------

Jiří Jurajda

e-mail: jiri.jurajda@ibill.cz

--	--	--	--