

Budapest Musculoskeletal Private Clinic

Privacy Notice

Information on the processing of personal data

Translation notice. This English version is provided for informational purposes only. The Hungarian original („Adatkezelési Tájékoztató”) remains the sole legally binding text. In case of any discrepancy between the Hungarian and English versions, the Hungarian version prevails. References to Hungarian laws and authorities are kept with their Hungarian names and an English explanation on first mention. GDPR terminology follows the official EU English wording.

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1. Introduction and Joint Controllership

The Budapest Musculoskeletal Private Clinic (*Budapesti Mozgásszervi Magánrendelő*, hereinafter: „BMM” or „the Clinic”) provides high-standard care across a wide range of services. We are committed not only to delivering excellence through highly qualified, experienced specialists and the latest diagnostic and treatment methods, but also to assuring our Patients that their personal data is protected to the highest standard. Before any processing of personal data begins, the Clinic informs the Data Subjects (Patients) of the relevant facts — in particular the purposes, legal bases, and duration of processing — by means of this Privacy Notice. This Notice also covers the rights and remedies available to our Patients and other Data Subjects in connection with our processing activities.

Under the applicable rules, our Service qualifies as a Controller. As Controllers we must process personal data lawfully and fairly. We must handle your data in a transparent manner: at every point of processing, you must be aware of how your personal data is collected, where and how it is used, how long it is processed, and whether it is transferred to any third party.

The principle of fairness and transparency requires that you be informed about the circumstances of processing. The Clinic therefore wishes to share its data protection and processing practices through this Notice, which forms an integral part of our detailed data protection policy. The policy set out in this Privacy Notice is uniform across all our locations: whichever of our offices you visit, processing follows the same principles.

Our Service operates under joint controllership. The subject of the joint controllership is the healthcare group practice operating under the „Budapest Musculoskeletal Private Clinic” brand — that is, the totality of processing operations carried out in the course of providing joint healthcare services.

In processing related to healthcare services, the Parties are joint controllers. Joint controllers are those who jointly determine the purposes and means of processing. Data subjects may exercise their GDPR rights with respect to and against any of the controllers.

For the handling and coordination of data protection matters, as well as for contact purposes, the Parties have designated a joint Data Protection Officer. As a joint contact point for handling Data Subject requests, the controllers designate the Data Protection Officer of MEDPORT Egészségügyi Szolgáltató Kft., available at the contacts below:

Controller contact: info@bmm.hu

Joint Controller contact: info@bmm.hu

Data Protection Officer: Dr. Moravcsik-Gazdag Gabriella

DPO contact: adatvedelem@bmm.hu

Controller liaison: Dr. Moravcsik Bence

Controller liaison contact: info@bmm.hu

2. The Joint Controllers

The following entities qualify as Controllers for the processing operations:

Controller 1 — MEDPORT Egészségügyi Szolgáltató Korlátolt Felelősségű Társaság (Limited Liability Company / Kft.)

Registered seat (székhely): 1114 Budapest, Bartók Béla utca 11-13. 3. em. 11.

Company registration number (cégjegyzékszám): 01-09-945711

Tax number (adószám): 22941967-2-43

Representative (képviselő): Dr. Moravcsik Bence Balázs

Controller 2 — MEDPORT CONSULTING Kft.

Registered seat (székhely): 1111 Budapest, Budafoki út 15. fszt. 6.

Company registration number (cégjegyzékszám): 01-09-391995

Tax number (adószám): 27486016-1-43

Representative (képviselő): Dr. Moravcsik Bence Balázs

Controller 3 — MEDICAL PLUS Kft.

Registered seat (székhely): 1037 Budapest, Bokor utca 15-21. fszt. 19.

Company registration number (cégjegyzékszám): 01-09-922179

Tax number (adószám): 14833944-1-41

Representative (képviselő): Dr. Moravcsik Bence Balázs

Controller 4 — ELEVEN-MED Egészségügyi Szolgáltató Kft.

Registered seat (székhely): 1111 Budapest, Budafoki út 15. fszt. 6.

Company registration number (cégjegyzékszám): 01-09-391996

Tax number (adószám): 27486030-1-43

Representative (képviselő): Dr. Moravcsik Bence Balázs

Controller 5 — ORVOSPRAxis-BMM 13 Egészségügyi Szolgáltató Kft.

Registered seat (székhely): 1133 Budapest, Pannónia utca 70.

Company registration number (cégjegyzékszám): 01-09-391997

Tax number (adószám): 27486054-1-41

Representative (képviselő): Dr. Moravcsik Bence Balázs

Controller 6 — SALGÓ-MOVE Egészségügyi Szolgáltató Kft.

Registered seat (székhely): 1144 Budapest, Kerepesi út 96. 10. em. 41.

Company registration number (cégjegyzékszám): 01-09-358679

Tax number (adószám): 27951473-1-42

Representative (képviselő): Dr. Moravcsik Bence Balázs

The Controllers declare that, in the course of their joint processing, they handle the data acquired within their activity in accordance with the laws in force at any given time. The Controllers respect the personal data of Data Subjects. They handle all data and facts coming to their knowledge confidentially and use them exclusively in line with the processing purposes. Processing is carried out solely in connection with healthcare provision and to fulfil other legal obligations. The lawfulness and principles of processing are aligned with the applicable data protection laws. The Controllers engage Data Processors; information on those Processors is provided in this Notice and, on specific request, via customer service. Where the legal conditions are met, upon official request the Controllers are obliged to provide and disclose personal data.

3. Clinic Locations

The Budapest Musculoskeletal Private Clinic operates at the following locations:

- 1023 Budapest, Zsigmond tér 10.
- 1037 Budapest, Bokor utca 15-21. fszt. 9.
- 1037 Budapest, Bokor utca 15-21. fszt. 19.
- 1111 Budapest, Budafoki út 15. fszt. 6.
- 1111 Budapest, Budafoki út 15. fszt. 3.
- 1111 Budapest, Budafoki út 15. 2. em. 2.
- 1111 Budapest, Budafoki út 17. C ép. fszt.
- 1133 Budapest, Pannónia utca 70. III. lp. ház fszt.
- 1133 Budapest, Pannónia utca 72-74. fszt.
- 1173 Budapest, Pesti út 183.
- 3100 Salgótarján, Kassai Sor 14.

4. Purpose and Scope of this Notice

1. The purpose of this Privacy Notice is to make you familiar with the data protection and processing principles applied by the Clinic. The Clinic recognises the data protection policy set out in this Notice as binding on itself.
2. When drafting the provisions of this Notice, the Clinic has taken particular account of Regulation (EU) 2016/679 of the European Parliament and of the Council („General Data Protection Regulation” or „GDPR”), Act CXII of 2011 on the Right to Informational Self-Determination and on Freedom of Information (Hungarian Information Act, „Info. tv.”), and the „special” sectoral regulation on the processing of health data, namely Act XLVII of 1997 on the Processing and Protection of Health and Related Personal Data.

5. General Definitions

1. **Personal data** (*Személyes adat*): Any data or information based on which a natural person („Data Subject”) becomes identifiable, directly or indirectly.
2. **Health data** (*Egészségügyi adat*): Personal data relating to the physical or mental health status of a natural person, including data on healthcare services provided to the natural person that reveal information about their state of health.
3. **Data Subject** (*Érintett*): Any identified natural person, or any natural person identifiable directly or indirectly on the basis of personal data. In our Service, the Data Subject is the Patient (in some cases also a relative) who uses our Healthcare Service.
4. **Medical confidentiality** (*Orvosi titok*): Health and personally identifying data coming to the Controller's knowledge during medical treatment, as well as data on necessary, ongoing or completed treatment and other information learned in connection with the treatment.
5. **Medical documentation** (*Egészségügyi dokumentáció*): Records, registers or data otherwise recorded — regardless of carrier or form — containing health and personally identifying data coming to the carer's knowledge during treatment.
6. **Treating physician** (*Kezelést végző orvos*): The physician carrying out or participating in the Data Subject's medical treatment.
7. **Consent of the Data Subject** (*Az Érintett hozzájárulása*): Any specific act of the Data Subject — voluntary, specific, informed and unambiguous — by which they consent to the processing of their personal data.
8. **The Clinic** (*A magánrendelő*): The healthcare service where you use medical care and where the patient examination takes place — in this case, the Budapest Musculoskeletal Private Clinic.
9. **Processing** (*Adatkezelés*): Any operation or set of operations performed on personal data, regardless of the procedure applied — in particular collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
10. **Controller** (*Adatkezelő*): The party determining the purposes and means of processing, alone or jointly with others — in this case, the Budapest Musculoskeletal Private Clinic.
11. **Processor** (*Adatfeldolgozó*): A service provider that processes personal data on behalf of the Controller. In our Service this may be, for example, the patient documentation software, a laboratory provider or the accounting firm; we specify them precisely for each type of processing.
12. **Data processing (by Processors)** (*Adatfeldolgozás*): Processors do not make independent decisions; they may act exclusively under the contract concluded with the Controllers and the instructions received. After 25 May 2018, Processors record, handle and process the personal

data transmitted to them by the Controllers in accordance with the provisions prescribed by the „GDPR” and provide the Controllers with a declaration to this effect. The Controllers verify the Processors' work.

13. **Recipient** (*Címzett*): The natural or legal person to whom personal data is disclosed.
14. **Personal data breach** (*Adatvédelmi incidens*): A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

6. Principles and Manner of Data Processing

1. As Controller, the Clinic processes personal data lawfully and fairly, in accordance with the principles of transparency, with the laws in force and with the rules set out in this Notice.
2. Personal data essential for using the Service are processed for the purposes specified in the applicable laws, or based on your consent as Patient, and used solely for the purpose for which they were collected. The scope of personal data processed is proportionate to the purpose of processing and does not go beyond it.
3. In every case where the Clinic wishes to use your personal data for a purpose different from that of the original collection, we will inform you and obtain your prior consent, or give our Patients the opportunity to prohibit such use.
4. As Controllers we do not verify the personal data provided. Only the person providing the data — that is, you — is responsible for the accuracy of the personal data provided. We therefore ask you to always double-check the data when you display or dictate them to our Clinic. If you find that your data are incorrectly recorded, you may exercise the right of rectification as set out in the „Rights of the Patient and how to exercise them” section.
5. Personal data of a person under the age of 16 — the Data Subject — may be processed only with the consent of the adult exercising parental supervision. As Controllers we are not in a position to verify the authority or content of the declaration of the consenting person; the Patient or the person exercising parental supervision warrants that the consent complies with the law. Please take note of this.
6. Personal data processed by the Clinic are not transferred to third parties other than the Processors specified in this Notice and certain Recipients referred to in this Notice.
7. The Clinic notifies the affected Patient — and any party to whom the personal data was previously transferred for processing purposes — of any rectification, restriction or erasure of the personal data processed. Notification may be omitted only where this does not, given the purpose of processing, prejudice the legitimate interest of the Data Subject.

7. Overview of Our Processing Activities

Our Clinic is a healthcare service-providing company. We carry out the examinations and treatments of Patients within private care, as a non-financed provider. Our Patients visit the Clinic voluntarily and

choose the care they wish to receive themselves. Whichever of our care services Patients use, they will encounter the same processing practices. We obtain natural person identifying data from the Data Subject. Our staff examine identification documents solely to verify the accuracy of the data; they never make copies.

7.1. Activities when you use a healthcare service at the Clinic

Processing of data related to healthcare provision (including treatment-related photo documentation)

Purpose of processing: When you visit the Clinic and use our care, we record your data in the documentation evidencing and describing the care (including photo documentation produced as part of the care). The purpose of processing is to promote the preservation, improvement and maintenance of health, to support effective medical treatment activity — including professional supervision —, to monitor the Data Subject's state of health, and to enforce patient rights. Photo documentation is produced as part of the healthcare provision.

Legal basis: Legal obligation (Act CLIV of 1997 on Healthcare; Act LXXXIII of 1997 on the Services of Compulsory Health Insurance; Decree 62/1997 (XII. 21.) NM on certain issues of the processing of health and related personal data).

Categories of data subjects: Patients using the service.

Personal data processed: Data necessary for identification and care: name, birth name, TAJ (Hungarian social security number), address, place and date of birth, data related to care.

Recipient: Nemzeti Egészségbiztosítási Alapkezelő (Hungarian National Health Insurance Fund Manager, NEAK); Elektronikus Egészségügyi Szolgáltatási Tér (the Hungarian electronic health record system, EESZT).

Data transfer: Emineo Magánkórház (care organisation for non-surgical patients), Budai Egészségközpont (care organisation for surgical patients), Szent Magdolna Kórház (care organisation for surgical patients).

Data processor: HEALZZ2 Patient Management System.

Storage location: Some of our documentation is created on paper, the rest electronically. Electronic documentation is stored on computers; paper-based documentation in lockable cabinets.

Retention period: Pursuant to Act XLVII of 1997 on health data processing and Act LXXXIII of 1997 on compulsory health insurance: 30 years. Imaging diagnostic results made available for the purposes of care are not stored; they are destroyed after 90 days.

Please note: previous care results and findings brought on paper or other data carrier for the examination are not retained on paper after they have been recorded in the documentation software. After recording and review, the treating physician returns them to the Patient. If a Patient leaves their findings at the clinic, we keep them securely for 90 days after the appointment date. The forgotten findings can be returned in person — to the Patient — within 90 days upon credible identification by the patient. After 90 days, unclaimed findings are destroyed permanently; no copy is made.

Inquiries, registration for care, and appointment booking

Purpose of processing: Patients' inquiries for appointment scheduling, and appointment booking.

Legal basis: Contractual basis.

Categories of data subjects: Patients initiating the use of care.

Personal data processed: Name, telephone number, e-mail address, chosen care, appointment time. We process your telephone number and e-mail contact details to facilitate communication.

Storage location: We store your data in our Patient Management Software.

Data processor: HEALZZ2 Patient Management Software; Gazdag András sole proprietor (website operator); Capitris call centre programme — calendar (ADERTIS Informatikai Fejlesztő és Szolgáltató Kft.).

Retention period: Booking e-mails are deleted following the close of the current quarter. Bookings in the patient management software are deleted following the financial close of the calendar year. If our patient does not appear at the examination after booking, the calendar entry is deleted quarterly.

Please note: if you display the data of a relative or another person (as a third party), you are required to ensure you have the third party's consent. We are not in a position to verify this. If, as a parent/guardian, you book an appointment for your minor child, your consent is required for processing of your children's data.

Recording of telephone calls

Purpose of processing: Quality assurance, complaint handling, subsequent verifiability, staff training.

Legal basis: Consent, legitimate interest (Article 6(1)(f) GDPR).

Categories of data subjects: Patients initiating the use of care.

Personal data processed: Audio recording.

Storage location: Capitris call centre programme.

Data processor: Capitris call centre programme.

Retention period: 2 years.

Outbound calls: please note that calls initiated by our staff are also recorded. We provide an oral notice of this at the beginning of the call. If you do not consent to the call being recorded, the call can be terminated before recording begins. In that case, your registration and care-related questions can be raised by letter or in person.

Online specialist consultation

Purpose of processing: Healthcare provision.

Legal basis: Legal obligation.

Categories of data subjects: Patients.

Personal data processed: Data necessary for identification and care.

Data processor: HEALZZ2 patient management software; ZOOM online consultation platform.

Retention period: Pursuant to Act XLVII of 1997 on health data processing and Act LXXXIII of 1997 on compulsory health insurance: 30 years.

Online physiotherapy

Purpose of processing: Healthcare provision.

Legal basis: Legal obligation.

Categories of data subjects: Patients using the care.

Personal data processed: Data necessary for identification and care.

Data processor: HEALZZ2 patient management software; ZOOM online consultation platform.

Retention period: Pursuant to Act XLVII of 1997 on health data processing and Act LXXXIII of 1997 on compulsory health insurance: 30 years.

Processing of data related to X-ray operation

Purpose of processing: Use of the healthcare service.

Legal basis: Fulfilment of a legal obligation.

Categories of data subjects: Data Subjects using the care.

Personal data processed: Data necessary for identification and care.

Data processor: Remote reporting (teleradiology).

Recipient: Elektronikus Egészségügyi Szolgáltatási Tér (EESZT, the Hungarian electronic health record system).

Retention period: Until withdrawal or unsubscription by the Data Subject.

Processing of data related to invoices

Purpose of processing: After care, the Clinic issues an invoice; we further process your invoicing data accordingly. Payment in every case takes place at the reception of our Healthcare Service after the examinations, where our staff issue the final invoice for you. Financial settlement; rules of accounting documentation.

Legal basis: Legal obligation (Act C of 2000 on Accounting; Act CXXVII of 2007 on Value Added Tax).

Categories of data subjects: Every Data Subject in whose name an invoice has been issued.

Personal data processed: Name and billing address of the payer, in some cases the Health Fund (egészségpénztár) membership ID, type of care, total amount.

Recipient: Nemzeti Adó- és Vámhivatal (Hungarian National Tax and Customs Administration, NAV).

Data processor: Naturasoft, HEALZZ2 patient management software; szamlazz.hu; Optitax Kft. (until 31 December 2018); Czinege Adótanácsadó Kft.; dr. Sallai Könyvvizsgáló és Tanácsadó Kft.; Gazdag András sole proprietor (operator of the settlement software); QUICK invoice management programme.

Storage location: At the Controller's headquarters and sites, kept securely, and at the offices of the accounting firm.

Retention period: Pursuant to Act C of 2000 on Accounting and Act CXXVII of 2007 on Value Added Tax: 8 + 1 years. Data in our own settlement programme are destroyed after the annual close.

Please note: if you display the data of a relative or another person (as a third party), you are required to ensure you have the third party's consent. We are not in a position to verify this.

Bank card payment

Purpose of processing: Payment for care by bank card, via an online interface.

Legal basis: Contractual basis.

Categories of data subjects: Data Subjects using a bank card.

Personal data processed: Data required for online payment.

Recipient: OTP Simple payment service.

Retention period: Until the end of the invoice retention period (8 + 1 years).

Photo documentation for scientific publication purposes related to healthcare provision

Purpose of processing: This photo documentation enables us to accompany and document the treatment process, allowing the Clinic to use the photos taken in scientific presentations. The published photo documentation, as „before-after” cases, helps demonstrate the exceptional and visually striking treatments performed.

Legal basis: Your consent as Patient.

Categories of data subjects: Patients who have consented to the presentation of their case.

Personal data processed: Name; photos of the care (in a non-identifying manner).

Data processor: Patient documentation software.

Retention period: Until withdrawal by the affected Patient.

Reviews and portrait images related to healthcare provision, and their use for publication purposes

Purpose of processing: Online publication of the clinic.

Legal basis: Your consent as Patient.

Categories of data subjects: Patients who have given their consent.

Personal data processed: Patient's review, name (also in anonymised, non-identifying form).

Data processor: Gazdag András sole proprietor.

Retention period: Until withdrawal by the affected Patient.

New patient referral by an existing patient using the healthcare service

Purpose of processing: Wider awareness of the service.

Legal basis: Consent.

Categories of data subjects: New Patients.

Personal data processed: Name, telephone number, e-mail address.

Data processor: MailMaster; Gazdag András sole proprietor (website and MailMaster); Sventek Kornélia Csilla sole proprietor and Mansour Mona sole proprietor (MailMaster).

Retention period: Until withdrawal by the affected Patient.

Processing related to data in patient satisfaction questionnaires

Purpose of processing: Quality assurance.

Legal basis: Your consent as Patient.

Categories of data subjects: Patients who share their opinion.

Personal data processed: Name, telephone number (also in anonymised, non-identifying form).

Data processor: MailMaster; Gazdag András sole proprietor; Sventek Kornélia Csilla sole proprietor; Mansour Mona sole proprietor.

Retention period: Until withdrawal by the affected Patient.

Processing of data related to sending the general informational newsletter

Purpose of processing: Processing takes place when you consent to receiving newsletters. By sending newsletters, the Clinic wishes to inform you, through marketing communications, about new treatments available at our Healthcare Service and any current promotions. Marketing communications to existing and prospective Patients.

Legal basis: Your consent.

Categories of data subjects: Subscribers to the newsletter.

Personal data processed: Name, e-mail address.

Data processor: MailMaster; HEALZZ2 patient management software; newsletter service access holders: Gazdag András sole proprietor; Sventek Kornélia Csilla sole proprietor; Mansour Mona sole proprietor; Putz Patrik sole proprietor.

Retention period: Until withdrawal or unsubscription by the Data Subject.

Please note: if you display the data of a relative or another person (as a third party), you are required to ensure you have the third party's consent.

Processing of data related to sending the personalised informational newsletter

Purpose of processing: Processing takes place when you consent to receiving newsletters. With our newsletters, the Clinic wishes to provide you with personalised information most closely related to your treatment, on new treatments available at our Healthcare Service and any current promotions. Marketing communications to existing and prospective Patients.

Legal basis: Your consent.

Categories of data subjects: Subscribers to the newsletter.

Personal data processed: Name, e-mail address, illness.

Data processor: MailMaster; HEALZZ2 patient management software; newsletter service access holders: Gazdag András sole proprietor; Sventek Kornélia Csilla sole proprietor; Mansour Mona sole proprietor; Putz Patrik sole proprietor.

Retention period: Until withdrawal or unsubscription by the Data Subject.

Please note: if you display the data of a relative or another person (as a third party), you are required to ensure you have the third party's consent.

Transfer of surgical patients' data to the surgical facility

Purpose of processing: Organisation and facilitation of the surgical intervention.

Legal basis: Legal obligation.

Categories of data subjects: Patients.

Personal data processed: Name, e-mail address.

Recipient: Emineo Magánkórház, Budai Egészségközpont, Szent Magdolna Kórház.

Data processor: HEALZZ2 software.

Retention period: Pursuant to Act XLVII of 1997 on health data processing and Act LXXXIII of 1997 on compulsory health insurance: 30 years. Imaging diagnostic results made available for the purposes of care are not stored; they are destroyed after 90 days.

Processing of data generated by CCTV surveillance

Purpose of processing: Please be advised that the Clinic uses an electronic surveillance system — enabling image capture and storage — in areas and premises marked with a sign. The operation of the CCTV system serves the protection of the legitimate interest of the Controller and its Patients. Our detailed CCTV rules are set out in our CCTV Policy. The purpose is the safety of our Patients and the Clinic, and asset protection.

Legal basis: Our legitimate interest.

Categories of data subjects: Every Data Subject (natural person) entering the Clinic's premises, who, after the notice provided (pictogram), enters the service area (accepting the notice through implied conduct).

Retention period: Up to deletion (10 days) / restriction / objection.

8. Our Data Processors

Our Service engages the following Data Processors:

- **HEALZZ2 patient management software — IT PRO Health Kft.** (seat: 1015 Budapest, Ostrom utca 16. fszt. 5; company registration number: 01-09-324925)
- **Gazdag András sole proprietor**
- **ARTERIA patient management software — Ezjú LájkiT Bt.** (seat: 2336 Dunavarsány, Bethlen Gábor u 17.; company registration number: 03-06-064979)
- **Foglaljorvost Online Kft.** (seat: 3043 Egyházasdengeleg, Petőfi út 2.; company registration number: 12-09-009222)
- **Capitris call centre programme — calendar — ADERTIS Kft.** (seat: 1113 Budapest, Gogol utca 13.; company registration number: 01-09-919558)
- **Naturasoft programme — Naturasoft Kft.** (seat: 1113 Budapest, Daróczi u. 11.; company registration number: 01-09-870298)
- **szamlazz.hu — KBOSS.hu Kft.** (seat: 1031 Budapest, Záhony utca 7.; company registration number: 01-09-101824)
- **Czinege AT Kft.** (seat: 1046 Budapest, Eötvös u. 2/a.; company registration number: 01-09-063754)
- **dr. Sallai Könyvvizsgáló és Tanácsadó Kft.** (seat: 1117 Budapest, Bercsényi u. 21. B. lp. ház. 604.; company registration number: 01-09-692016)
- **QUICK invoice management programme — Riport Applications Kft.** (seat: 1052 Budapest, Deák Ferenc tér 3.; company registration number: 01-09-982509)
- **MailMaster — SalesAutopilot Kft.** (seat: 1016 Budapest, Zsolt utca 6/A. 5th floor 1.; company registration number: 01-09-286773)
- **Sventek Kornélia Csilla sole proprietor**
- **Mansour Mona sole proprietor**
- **Putz Patrik sole proprietor**
- **Monday.com online task management platform**
- **OneDrive file sharing (Microsoft)**
- **Zoom.com (online consultation)**
- **MR examination — MMREP Egészségügyi Szolgáltató Kft.** (seat: 1131 Budapest, Szent László út 101-103.; company registration number: 01-09-378181)

9. Data Subject Rights and How to Exercise Them

9.1. Right to information and access to personal data

1. As Patient, you may request that the Clinic inform you whether your personal data is being processed and, if so, give you access to the personal data we process about you.
2. You may contact us in writing at any time regarding the processing of your personal data — by registered or registered-with-acknowledgement-of-receipt letter to the Clinic's address, or by e-mail to adatvedelem@bmm.hu. A request for information sent by letter is considered authenticated if the Patient can be unambiguously identified on the basis of the request

submitted. A request for information sent by e-mail is considered authenticated by the Clinic only if sent from the Patient's registered e-mail address. This does not preclude the Clinic's Data Protection Officer from identifying the Patient by other means before providing the information.

3. The request for information may cover the data of the Patient processed by the Controller, their source, the purpose, legal basis and duration of processing, the name and address of any processors, activities related to processing, and — in case of transfer of personal data — who has received or will receive your data and for what purpose.

9.2. Right to rectification

1. You may request the Clinic to rectify inaccurate personal data we process about you. Taking into account the purpose of processing, you may also request the completion of incomplete personal data.

9.3. Right to erasure

The Patient may request the erasure of personal data processed by the Clinic. **Erasure may be refused where the processing of personal data is authorised by law.** Thus, in the „List and purpose of our processing activities” section, where you see „legal obligation” as the legal basis of processing, those data cannot be erased, as their storage is required of the Clinic by law. Such data are in particular those processed in connection with healthcare provision and invoicing. We will always inform you of any refusal of an erasure request, indicating the reason for refusal. Please note that once an erasure request has been fulfilled, the previously (now erased) data cannot be restored.

9.4. Right to restriction of processing

1. As a Patient using our service, you may request that the Clinic restrict the processing of your personal data if you contest the accuracy of the personal data processed. In such case, the restriction applies for a period enabling the Controller to verify the accuracy of the personal data.
2. You may also request the Clinic to restrict the processing of your personal data if processing is unlawful but you, as Patient, oppose the erasure of the personal data processed and instead request restriction of their use.
3. You may request that the Clinic restrict the processing of your personal data where the purpose of processing has already been fulfilled, but you require the Controller to retain the data for the establishment, exercise or defence of legal claims.

9.5. Right to data portability

1. The Patient may request that the Clinic provide them, in machine-readable format, with the personal data they have made available and that are processed by automated means, or that the Clinic transfer them to another Controller. This does not apply to health data.

9.6. Right to object

1. The Patient may object to the processing of their personal data where the personal data are processed for direct marketing purposes.

10. Procedural Rules

1. Where a request is received by the Clinic, we inform you in writing of the measures taken on the basis of the request as quickly as possible, but no later than within 30 days.
2. Where justified by the complexity of the request or other objective circumstance, the above deadline may be extended once by no more than 60 days. We will notify you in writing of any extension of the deadline, together with appropriate reasons.
3. The first information is provided free of charge, except where: (a) the Patient requests information or a measure with substantially unchanged content on a repeated basis; (b) the request is manifestly unfounded; (c) the request is excessive.
4. Where the applicant requests the data on paper or on electronic media (CD or DVD), the Controller provides a copy of the affected data free of charge in the requested manner (except where the chosen platform would entail technically disproportionate difficulty). An administrative fee may be charged for any further requested copy, of which we inform the applicant in advance.
5. The Clinic provides its response to the request electronically, except where: (a) the Data Subject expressly requests the response in a different manner and this does not entail unreasonably high additional expenditure for our Service; (b) the Clinic does not know the electronic contact details of the Data Subject.

11. Data Security

1. The Clinic stores the data it processes — both on paper and in electronic form — at its registered seat and sites.
2. To protect data processed electronically, we apply solutions providing an appropriate level of security in line with the current state of the art. In assessing appropriateness, particular emphasis is placed on the level of risk arising from the processing carried out in our Healthcare Service.
3. The Clinic does everything possible to ensure the security of the data of Patients using the service, and takes the technical and organisational measures and establishes the procedural rules necessary to give effect to the Regulation and other data protection and confidentiality rules.
4. Data Subject data stored in the Clinic's database may only be accessed by employees of the Clinic with expressly granted authorisation, up to the level of access established.
5. We ensure that the data collected, stored and processed are protected, and prevent their accidental loss, unlawful destruction, unauthorised access, unauthorised use, unauthorised

alteration and unauthorised dissemination. The Clinic calls on every third party to whom it transfers personal data to fulfil this obligation.

6. The IT system of our Service is protected against unauthorised access by a firewall.
7. The Controller and any engaged Processors at all times provide protection of their IT systems against fraud, espionage, viruses, intrusions, vandalism and natural disasters. Our Healthcare Service as Controller, and our Processors as well, apply server-level and application-level protection procedures. Our Processors confirm these protection procedures to our Service by declaration or agreement.
8. Devices used to store data are password-protected; access levels are strictly regulated in the manner established in our Service.
9. For documents stored on paper, we apply closed storage that prevents unauthorised access. Access to documents stored on paper is regulated by the Clinic through the implementation of authorisation levels.
10. Messages transmitted to the Clinic over the internet — in any form — are exposed to an elevated risk of network threats that may lead to modification of information, unauthorised access or other illegal activity. Our Healthcare Service does everything that, given the current state of the art, can reasonably be done to address such threats. To this end, the systems used are subject to monitoring, so that security deviations can be recorded, evidence obtained regarding security incidents, and the effectiveness of safeguards examined.

12. Complaints Handling

1. Data protection-related requests, objections, complaints, and questions and observations relating to processing are handled by the Clinic.
2. If you have not been able to resolve your objection, complaint or request concerning your personal data with our Service satisfactorily, or if at any time you consider that an infringement of your rights related to processing has occurred or there is a direct risk thereof, you are entitled to file a notification with the Hungarian National Authority for Data Protection and Freedom of Information.

Complaints related to processing may be addressed directly to the Hungarian Data Protection Authority:

Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)

(Hungarian National Authority for Data Protection and Freedom of Information)

Seat: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf.: 9.

Phone: +36 (1) 391-1400; +36 (30) 683-5969; +36 (30) 549-6838

E-mail: ugyfelszolgalat@naih.hu

3. Where the Clinic receives an official request from authorities entitled to make such a request, it is required to provide the specified personal data. We provide only data that are strictly

necessary and have an appropriate legal basis for the purpose specified by the requesting authority.

4. In case of infringement of your rights, you may bring an action before a court against the Controller, or — in connection with processing operations falling within the Processor's activity — against the Processor.
5. It is for the Controller or Processor to prove that processing complies with the law. The Data Subject may, at their option, also bring the action before the court of their place of residence or stay. A party who otherwise lacks legal capacity to sue may also be a party to the proceedings. The Hungarian Data Protection Authority may intervene in the proceedings to support the Data Subject's success.

13. Personal Data Breach

1. Where a personal data breach occurs, the Clinic notifies the competent Supervisory Authority without undue delay and no later than 72 hours after becoming aware of the breach, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.
2. Where the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Clinic informs you — the Data Subject (Patient) — of the breach without undue delay and takes the measures set out in its internal policy.

14. Applicable Laws

The following laws apply to the processing described in this Notice:

- 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 and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter: „GDPR”)
- Act V of 2013 on the Civil Code (Ptk.)
- Act CXII of 2011 on the Right to Informational Self-Determination and on Freedom of Information (Info. tv.)
- Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Commercial Advertising Activity
- Act CXXVII of 2007 on Value Added Tax
- Act C of 2000 on Accounting
- Act XLVII of 1997 on the Processing and Protection of Health and Related Personal Data
- Decree 62/1997 (XII. 21.) NM on Certain Issues of the Processing of Health and Related Personal Data

The Clinic does not use the personal data provided for purposes other than those described in this Notice. Transfer of data to the Processors specified in this Notice may take place without separate consent of the Patient. Disclosure of personal data to third parties or authorities — unless otherwise provided by law — is possible only on the basis of an official decision, or with the prior express consent of the affected Patient.

15. Changes to this Notice

The Clinic reserves the right to amend or update this Notice at any time without prior notice and to publish the updated version. Any amendment applies exclusively to personal data collected after publication of the amended version.

Please check our Notice regularly to follow the changes and to be informed about how the changes affect you.

Effective from: 1 June 2022. Budapest Musculoskeletal Private Clinic <i>www.bmm.hu</i>	Data Protection Officer Dr. Moravcsik-Gazdag Gabriella <i>adatvedelem@bmm.hu</i>
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