

PRIVACY POLICY OF RADIO DENTAL EXTRA KFT.

This disclosure of information has been issued by **RADIO DENTAL EXTRA Korlátolt Felelősségű Társaság** (registered seat: H-1164 Budapest, Cinkotakert utca 5. 2.; registering authority: Fővárosi Törvényszék Cégbírósága /Company Registry Court of Budapest-Capital Regional Court/; company registration number: 01-09-182921; tax number: 24797410-2-42; statistical code: 24797410-8690-113-01; represented by: **Izsó Istvánné** /mother's name at birth: Virág Éva Anna/ managing director) as the data controller (hereinafter: "**Controller**") to provide the data subject with the most important information on data processing concerning the Controller's services in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: "the Regulation") and Act XLVII of 1997 on the Processing and Protection of Health Care Data and Associated Personal Data (hereinafter: "Health Data Act"). This privacy policy (hereinafter: "Privacy Policy") on the handling of personal data, issued by the Controller, contains the complete information in data processing.

1. General Provisions

- 1.1 This Privacy Policy contains the rules on processing, handling and transmitting personal data of natural persons receiving any human health services and related services (hereinafter: "Services") provided by the Controller (hereinafter: "**Data Subject**"). Data processing under this Privacy Policy shall be conducted on the basis of the legal relationship deriving from the providing of Services between the Controller and the Data Subject.
- 1.2 The Controller informs the Data Subject that during the performance of the Services, all personal data held by the Controller will be recorded.
- 1.3 The legal basis for data processing shall be the performance of a contract pursuant to the Regulation to which Data Subject is one of the parties, or Section 5(1)b of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: "Information Act"), or also the written consent of the Data Subject with that in accordance with the provisions of the Health Data Act, until proven otherwise, the consent of the Data Subject shall be deemed as given if the Data Subject voluntarily contacts the Controller. The consent shall be given through the appropriate use an IT device capable of digitizing the image of the signature located in the institute operated by the Controller.
- 1.4 The contents of the Privacy Policy serve to fulfil the obligations laid down in Section 13 of the Regulation and in Sections 14a and 15(1)a of the Information Act by providing full disclosure to Data Subject on all matters indicated therein with regard to data processing.
- 1.5 Data processing shall extend to the following data ("**Data**") concerning the Data Subject:
 - name;

- place and date of birth;
- citizenship;
- address;
- mother's name at birth;
- social security number;
- e-mail address;
- phone number.

1.6 The purpose of data processing is to simplify the settlement of any disputes and to enable the Controller – regarding Section 4(1) of Health Data Act – to provide the Services to the Data Subject at the highest possible quality.

The purposes of data processing particularly are:

- complete and contractual performance of the Services,
- settling fees and costs, billing;
- record of cases;
- document management in accordance with its own administrative and legal obligations.

1.7 The Controller and the natural persons employed by or engaged in a work-related relationship with the Controller, as well as any partners of the Controller involved in the providing of the Services shall be entitled to process data and data processing conducted on that basis. The persons specified in this subsection shall be entitled to obtain the data provided by the Data Subject to the Controller.

1.8 The Controller informs the Data Subjects that, in view of the final phrase of paragraph (91) set out in the introductory provisions of the Regulation, no impact assessment has been carried out and no Data Protection Officer has been appointed.

1.9 With regard to definitions concerning data processing, the definitions specified in the Regulation and in the Information Act shall prevail.

1.10 The Controller provides the possibility to book an appointment online on the website at www.radiodental.hu (hereinafter: "Website"). With the clicking on the "Online Patient Booking" menu item on the Website, the Data Subject consents that the operator of the website under the address of www.foglaljorvost.hu, which handles the bookings, will forward the data provided to the Data Controller during the booking and also consents that the Data Controller shall access to the data, and also to send an e-mail notification from the operator to the e-mail address provided by the Data Subject at the time of booking. The provisions of this point also apply for the cases where the booking is made by telephone or in person.

2. Means of data processing

2.1. In view of Section 1.3, the Data Subject acknowledges that the Controller shall collect, process and transmit their Data for the purposes and to the extent stipulated in Section 2 of this Privacy Policy. Data provision shall be voluntary in all cases.

- 2.2. The Controller shall process the Data Subjects' data for the purposes of providing the Services, for fulfilling its obligations arising from the business activities conducted, only to the extent and for the duration necessary to achieve its purpose as defined in Section 5 of the Regulation and in Section 4 of the Information Act. Data processing in all its stages shall comply with those purposes. The Controller does not misuse the Data in any way disclosed to it as part of its data processing activities.
- 2.3. The Controller informs the Data Subjects that Data shall be processed and retained for the duration of providing the Services, and afterward handles and preserves it for the period specified by law.
- 2.4. The Data processed by the Controller shall be disclosed to a third party only if the disclosure is in the Data Subject's interest, or if it is necessary for the Controller to fulfil its legal obligations. By signing the contract specified in Section 1.3, the Data Subject expressly consents to the transfer of their Data if the Controller believes that the interests of the Data Subjects so require. The Controller shall maintain a transmission log in all cases, in line with Section 8 and 25/E(1) of the Information Act, indicating the date and time of transmission of the data concerning Data Subject, the legal basis of transmission as specified in this Subsection, the recipient, and a description of the scope of Data transmitted, with the above information retained for the duration prescribed by the legislation on data processing, but not less than for five (5) years.
- 2.5. The Controller shall not transmit the Data of the Data Subject to international organisation or to third country – i.e., outside the European Union and the EEA - except with the express approval of the Data Subject and in accordance with the conditions set out in the written declaration of the parties, by providing guarantees in accordance with Sections 10-13 of the Regulation. The former restriction does not apply to cases provided for in Article 45 of the Regulation, which states that a transfer of personal data to a third country or an international organisation may take place where the Commission has decided that the third country or the international organisation in question ensures an adequate level of protection. Such a transfer shall not require any specific authorisation.
- 2.6. Data processed by the Controller shall not be used in the interest of a third party and Data shall not misuse such information in any other way.
- 2.7. Data must be protected by the Controller through means of suitable measures, in particular against unauthorized access, alteration, transmission, public disclosure, deletion or destruction, as well as damage and accidental loss, and to ensure that stored data cannot be rendered inaccessible.
- 2.8. The Controller informs the Data Subject that it does not make decision regarding the Data Subject based solely on automated data processing. The Controller does not create profiles about the Data Subject based on the available Data.
- 3. Data Subject's options regarding data processing**

- 3.1. The Data Subject has the right to request information from the Controller on the processing of their Data, as well as the rectification, erasure or blocking of such data by the following means:
- by postal mail: H-1164 Budapest, Cinkotakert utca 5. 2.;
 - by e-mail: iroda@radiodental.hu
- 3.2. Upon the Data Subject's request, the Controller shall provide information concerning the Data processed by the Controller, the sources from where they were obtained, the purpose, grounds and duration of processing, and the legal basis of data transmission and the recipients. The Controller must comply with requests for information without any delay (after having received such a request), and provide the above information in an intelligible form, in writing within not more than fifteen (15) days. The Controller may refuse to provide information only in the cases defined under Section 16(3) of the Information Act. Should a request for information be denied, the Controller shall inform the Data Subject in writing as to the provision of the Information Act serving grounds for refusal. Where information is refused, the Controller shall inform the Data Subject of the possibilities for seeking judicial remedy or lodging a complaint with the National Authority for Data Protection and Freedom of Information (*Nemzeti Adatvédelmi és Információszabadság Hatóság*).
- 3.3. The Controller shall rectify the Data where it is deemed inaccurate, and where the correct personal data is at the Controller's disposal.
- 3.4. The Data shall be erased: if processed unlawfully; if so requested by the Data Subject; if the processed data is incomplete or inaccurate and it cannot be lawfully rectified, provided that erasure is not disallowed by statutory provision of an act; if the purpose of processing no longer exists or the legal time limit for storage has expired, or; if so ordered by court or by the National Authority for Data Protection and Freedom of Information.
- 3.5. The Data shall be blocked if so requested by the Data Subject, or if there are reasonable grounds to believe that erasure could affect the legitimate interests of the Data Subject. Any blocked Data shall be processed only for the duration of the purpose which prevented their erasure.
- 3.6. If the accuracy of an item of the Data is contested by the Data Subject and its accuracy or inaccuracy cannot be ascertained beyond doubt, the Controller shall mark that Data.
- 3.7. The Controller has fifteen (15) days at its disposal for erasing, blocking or rectifying the Data. If the Controller refuses to comply with the Data Subject's request for rectification, blocking or erasure, the reasons for such refusal shall be communicated in writing, or by electronic means in case the Data Subject had so consented, within fifteen (15) days of receipt of the request. Where rectification, blocking or erasure is refused, the Controller shall inform the Data Subject of the possibilities for seeking judicial remedy or lodging a complaint with the National Authority for Data Protection and Freedom of Information.
- 3.8. When Data is rectified, blocked, marked or erased, the Controller shall notify the Data Subject and all recipients to whom it has been transmitted for processing. Notification is not required if

such an omission does not violate the rightful interest of the Data Subject considering the purpose of processing.

4. Information on doctors registering on the Controller's website

General provisions

- 4.1. The contents of this Privacy Policy shall apply to those doctors and the processing of their personal data – with the exceptions set out in Section 4 – who choose the option “Registration for new doctors” on the Website of the Controller.
- 4.2. With the registration in accordance with Section 4.1., the Data Subject shall give their consent at the same time the data contained therein to being contacted by the employee of the Controller at any of the contact details provided there to initiate a personal meeting. The Data Subject may withdraw its consent under this Section at any time.
- 4.3. The data management covers the following data – a hereinafter: Data – relating to the Data Subject: the name, phone number, e-mail address of the Data Subject.

5. Information on marketing data management

- 5.1. In case of written consent given by the Data Subject, the Controller shall send an e-mail notification for marketing purposes to the e-mail address provided by the Data Subject at the times specified by the Controller. The Data Subject may withdraw the consent specified in this section at any time.
- 5.2. For the data processing specified in this Section 5, the provisions of this Privacy Policy shall be applied with the exception of the provisions specified in Section 1.4., 1.6. and 1.10.
- 5.3. The data processing covers the following data related to the Data Subject: the name, phone number, e-mail address of the Data Subject.
- 5.4. The purpose of the data processing specified in this Section 5 is to keep in touch with the Controller in order to maintain a high-quality customer relationship.

6. Social media data management information

- 6.1. The Controller operates a social media site – facebook profile – under the address <https://www.facebook.com/RadioDentalExtra>, which informs the Data Subject in connection with the data processing from the followings:
- 6.2. Facebook cookies („cookie”)
Cookies collect information about the use of the website (eg: viewed subpages) in order to display advertisements targeted to the Data Subject on the Facebook interface.
More information about the cookies is available on the following websites:
<https://policies.google.com/technologies/types>

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>
<https://www.facebook.com/help/cookies/>

6.3. Data management for profiles created on social media sites

The purpose of data processing is to operate and moderate the community profile (Facebook) of the Controller, to describe the services provided by the Controller, and to continuously improve these services through the analysis of traffic data.

The legal basis of the data processing is the consent of the Data Subject, which is given, for example, by accessing the site, writing an opinion or commenting on the Controller's entries (Article 6(1)a) of the Regulation), and the legitimate interest in the proper operation and moderation of the Controller's community profile (for example, to delete offensive posts; GDPR Article 6(1)f) of the Regulation).

The data processing shall cover the following data – hereinafter: Data – relating to the Data Subject: name and all the personal data published by the Data Subject themselves on the social networking sites and related to the Data Controller's social networking profile, or writes in any comment with connection of it.

The personal data (including comments) shall be deleted at the latest 5 years (general limitation period) from the time the Data Subject accessed the site and wrote a post.

The Controller shall not forward the data came aware if it in with the operation of its profile page created on social networking sites to third parties.

The failure of providing data will not result in consequences.

The Controller informs the Data Subject that the social media profile under the address of <https://www.facebook.com/pages/Radio-Dental/148980305166414> is not under the control, operation and management of the Controller and does not perform any data management activities in relation to the data published on this interface.

Full information on Facebook's privacy practices - Privacy Policy - is available at:

<https://hu-hu.facebook.com/privacy/explanation>