

## **PRIVACY POLICY**

**Medicover Egészségközpont Zártkörűen Működő Részvénytársaság  
(Medicover Health Care Center Joint Stock Company)**

**Effective from: 13<sup>th</sup> December 2024**

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The present privacy policy contains the criteria of the activity of **Medicover Egészségközpont Zártkörűen Működő Részvénytársaság** (Medicover Health Care Center Joint Stock Company, hereinafter referred to as Medicover) related to the management of personal data. In the following you may be informed about which personal data is managed by Medicover, for which purpose and on which legal basis, for how long, as well as the persons who may learn and access the personal data managed by Medicover. In addition to the above, in the following you may find detailed information on the rights you are entitled to related to the data management and how these rights may be exercised.

If you have any questions or concerns related to the data management or the provisions of the present privacy policy, then please send those to following e-mail address: [data.protection@medicover.hu](mailto:data.protection@medicover.hu).

Medicover may modify the present privacy policy in particular in case of the introduction of new data management or in case the data management already in progress changes, of which Medicover will notify its clients and other natural persons concerned primarily on its website.

## 1. How does Medicover manage personal data?

Medicover **manages and protects** the information obtained by Medicover in course of its activity and related to any natural person (e.g. personal identification data, contact data, health data, etc.), i.e. personal data, **as data controller, in compliance with Regulation (EU) 2016/679** 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 – **GDPR**) as well as the relevant Hungarian data protection laws.

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| <b>Name:</b>                                | <b>Medicover Egészségközpont<br/>Zártkörűen Működő Részvénytársaság</b><br>(Medicover Health Care Center Joint Stock Company) |
| <b>Registered seat and mailing address:</b> | <b>H-1134 Budapest, Váci út 29-31.</b>  |
| <b>E-mail address:</b>                      | <b><a href="mailto:data.protection@medicover.hu">data.protection@medicover.hu</a></b>   |
| <b>Website address:</b>                     | <b><a href="http://www.medicover.hu">www.medicover.hu</a></b>   |

The definition of data management related to personal data includes any operation or set of operations which is performed on personal data, such as recording, storage, consultation, use, disclosure, transmission, erasure or destruction. In course of the management of the personal data Medicover takes the necessary and appropriate measures to prevent unauthorized access to the personal data and the unauthorized use thereof.

Therefore, in particular Medicover ensures the physical protection of its facilities (e.g. through the operation of entry and camera system) and the protection against unauthorized access of its electronic systems (e.g. through the use of firewalls, secure authentication).

The personal data managed by Medcover may be accessed by its employees and contributors, to the extent necessary to fulfil their tasks and to the provision of services to you, subject to confidentiality obligation. In addition, Medcover may transfer the data managed by Medcover to third parties, e.g. to authorities, in order to fulfil its legal obligations. Data may be transferred in order to provide services to you (e.g. in case of the use of external service providers), as well as if Medcover employs any data processor for certain data management operations (e.g. data storage, systematization), which data processor shall act on behalf and according to the instructions of Medcover. Also in case of the latter data management Medcover ensures that the personal data are transferred only to those data processors which provide appropriate guarantees for ensuring the security of the data management and your personal data.

**2. Which personal data are managed by Medcover?**

Below you may find general information on the data managements of different purposes of Medcover. If you wish to receive customized information, e.g. regarding the exact recipient Medcover had transmitted your personal data and when it did so, then please send your request to the following e-mail address: [data.protection@medicover.hu](mailto:data.protection@medicover.hu).

**A. Data management related to the provision of healthcare services, to the fulfilment of contract for the provision of healthcare services**

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| <b>Purpose of the data management</b>       | Provision of healthcare services, the conclusion, modification and termination of the contract related thereto, fulfilment of the obligations related to the contract, enforcement of rights and claims which may arise, defence against claim enforcement, performance of legal obligation, as well as correspondence.                 |
| <b>Legal basis of the data management</b>   | Fulfilment of contract for provision of healthcare (GDPR Article 6(1) (b))<br><br>Performance of legal obligation (GDPR Article 6(1) c))<br>legitimate interest of Medcover to enforce claims (GDPR Article 6 (1) f))   |
| <b>Scope of the personal data concerned</b> | Medcover manages the following data:<br>- Personal identification data (e.g.: name, date of birth, mother’s name),<br>- Contact data (address, postal address, telephone number, e-mail address),<br>- data concerning health occurring related to the healthcare provided, as well as the TAJ (social security) identification number, |

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|  | <ul style="list-style-type: none"> <li>- in case of persons insured by any insurance company providing health insurance and in the framework of group health insurance, the workplace, insurance package</li> <li>- Job function, religious belief and racial origin, if any of those is relevant in terms of the healthcare service,</li> </ul> <p>The above personal data are provided partially by you as data subject to Medcover in connection with the healthcare services, or those are obtained by Medcover from other healthcare service provider with your approval. In addition, in case of occupational health service, your employer as the client of Medcover will transfer the personal identification and contact data necessary to the occupational health examination to Medcover. If you are a person insured by any of the insurance companies providing health insurance, then the health insurance company will transfer the personal identification and contact data to Medcover in the interest of the provision of the healthcare services.</p> <p><b>Which are the personal data concerning health?</b> Personal data concerning health should include all data pertaining to the physical or mental health status of a natural person, as well as all data which had emerged related to his/her health status and in connection with the healthcare service used by him/her.</p> |
| <p><b>Duration of the data management; erasure</b></p> | <p>Medcover retains and manages all data concerning health and personal identification data which are part of the healthcare documentation under Act XLVII of 1997 on Management and Protection of Data Concerning Health and the Personal Data Related Thereto and are related to the healthcare service for 30 years calculated from the data collection, while Medcover retains and manages the discharge summaries for 50 years. Medcover retains and manages the images prepared with diagnostic imaging procedure for 10 years calculated from the taking thereof. Upon the expiry of these deadlines the healthcare documentation containing the personal data will be erased, destroyed.</p>  |

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| <p><b>Categories of recipients, data transfer</b></p> | <p>Medicover transfers the personal data to the following recipients:</p> <ul style="list-style-type: none"> <li>- for the purpose of healthcare services, provision of care, fulfilment of contract, the data necessary thereto, to its healthcare service provider partners (e.g. carrying out laboratory examinations, emergency care, in case of certain special care);</li> <li>- to the authorities specified by law, in order to fulfil reporting obligation (e.g. in case of the implantation of an implant, data provision to the Central Implant Register);</li> <li>- to authorities, courts specified by law, upon the official inquiry, order thereof, based on the law;</li> <li>- to its data processor providing document archiving, document storage services, based on data processing contract;</li> <li>- to its data processor providing server hosting services, based on data processing contract;</li> <li>- to companies carrying out the delivery of consignments as data processors, the data necessary to the delivery (name and address), based on data processing contract;</li> </ul> |
| <p><b>Consequence of failure to provide data</b></p>  | <p>The data provision is necessary for the provision of the healthcare services and the fulfilment of the contract, therefore in case of the failure of the data provision, the services cannot be provided or cannot be provided properly.</p>  |

### **B. Data management related to complaints**

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| <p><b>Purpose of the data management</b></p>     | <p>Complaint management, investigation of the circumstances of the case subject to the complaint and the management of the complaint.</p>   |
| <p><b>Legal basis of the data management</b></p> | <p>Fulfilment of contract (GDPR Article 6(1)(b));</p> <p>Fulfilment of the legal obligation related to complaint management as specified in Act CLIV of 1997 on Healthcare regarding complaint management (GDPR Article 6(1)(c));</p> <p>Your consent as data subject, which you grant to Medicover by submitting the complaint, in particular if the healthcare service was not used by you but by for example your relative, however, the complaint is submitted by you (GDPR Article 6(1)(a)).</p> |

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| <p><b>Scope of the personal data concerned</b></p>     | <p>The personal identification data provided in the complaint by the party submitting the complaint (typically: name, e-mail address, address), as well as the personal data and – as the case may be – the data concerning health included in the complaint.</p>   |
| <p><b>Duration of the data management; erasure</b></p> | <p>According to Act CLIV of 1997 on Healthcare, the duration of the data management is 5 years calculated from the conclusion of the complaint case, upon the expiry of which deadline the data will be erased, destroyed.</p>  |
| <p><b>Categories of recipients, data transfer</b></p>  | <p>Medicover transfers the personal data and – as the case may be – data concerning health related to complaints to the following recipients:</p> <ul style="list-style-type: none"> <li>- to its healthcare service provider partners, for the purpose of investigating the circumstances of the healthcare service subject to the complaint;</li> <li>- to authorities, courts specified by law, upon the official inquiry, order thereof, based on the law;</li> <li>- to its data processor providing document archiving, document storage services, based on data processing contract;</li> <li>- to companies carrying out the delivery of consignments as data processors, the data necessary to the delivery (name and address), based on data processing contract.</li> </ul> <p>In case of persons insured by any insurance company providing health insurance, to the insurance company or the employer, if the complaint was received through any of those and if the data subject granted his/her consent to the personal data being transferred to the insurance company or his/her employer in connection with the complaint management.</p> |
| <p><b>Consequence of failure to provide data</b></p>   | <p>All relevant data related to the complaint are necessary to manage the complaint and investigate the circumstances. In case of failure to provide data or in case of incomplete data provision, the complaint cannot be managed or cannot be managed properly.</p>   |

### C. Recording telephone calls

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| <p><b>Purpose of the data management</b></p>           | <p>The general purpose of recording the telephone calls is to prove the statements made during the call. In case of complaints made via telephone, the purpose is the exact entry, recording of the complaint. In addition, purposes are the provision of services, proper reply to telephone inquiries, as well as the continuous improvement of the quality of the services of Medicover.</p> |
| <p><b>Legal basis of the data management</b></p>       | <p>The legal basis of the data management is your consent as data subject, which you grant by continuing the call after having been notified of the recording (GDPR Article 6(1)(a)).</p>   |
|  | <p>In addition, another legal basis is the legitimate interest of Medicover related to quality assurance and enforcement of claims (GDPR Article 6(1)(f)).</p>  |
| <p><b>Scope of the personal data concerned</b></p>     | <p>The sound of the data subject and the personal data said during the telephone call made to and had on the +36 1 465 3100, the date and time, duration of the call, as well as the telephone number.</p>  |
| <p><b>Duration of the data management; erasure</b></p> | <p>The duration of the data management is consistent with the period of limitation (claim enforcement deadline – 5 years calculated from the end of the call; in case of complaints, calculated from the conclusion of the complaint case), upon the expiry of which period the data will be erased, destroyed</p>  |
| <p><b>Categories of recipients, data transfer</b></p>  | <p>Medicover transfers the personal data provided during the telephone call to the following recipients:</p> <ul style="list-style-type: none"> <li>- to authorities, courts specified by law, upon the official inquiry, order thereof, based on the law.</li> </ul>   |
| <p><b>Consequence of failure to provide data</b></p>   | <p>In case of complaints made via telephone, in case of failure to provide data or in case of incomplete data provision, the complaint cannot be managed or cannot be managed properly. In other cases, without the provision of the personal data the request of the data subject cannot be fulfilled, and the question concerning such person cannot be answered.</p>                         |



**D. Data management related to other inquiries, client satisfaction questionnaire, as well as correspondence**

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| <p><b>Purpose of the data management</b></p>       | <p>The purposes of the data management is correspondence, and as the case may be, the fulfilment of the contract concluded with Medicover, provision of services, collection and evaluation of feedback related to the quality of the performed service, and thereby the improvement of the level of standard of the service. In other cases, the purpose is replying to notifications, inquiries and questions.</p>  |
| <p><b>Legal basis of the data management</b></p>   | <p>In case of the persons specified by the contractual partners of Medicover as contact person in the contract, the legal basis of the data management is the legitimate interest of Medicover and the contractual partner thereof related to the fulfilment of the contract (GDPR Article 6(1)(f)).</p> <p>In case of other notifications, inquiries, questions that are not complaints, Your consent as data subject, which you grant to Medicover by submitting the notification, inquiry, question (GDPR Article 6(1)(a)).</p> <p>When sending a client satisfaction questionnaire or requesting an assessment for a service already fulfilled by Medicover, the processing is compatible with the purpose for which the personal data were initially collected, in such a case, no legal basis separate from that which allowed the collection of the personal data is required (processing of personal data for purposes other than those for which the personal data were initially collected, further process).</p> |
| <p><b>Scope of the personal data concerned</b></p> | <p>The</p> <ul style="list-style-type: none"> <li>- name</li> <li>- (work) telephone number,</li> <li>- (work) e-mail address,</li> <li>- further personal data included in the inquiry, notification</li> </ul> <p>of the person specified as contact person in the contract, as well as any person who contacts Medicover with any notification, inquiry or question, request (directly or through the interface to be found at the following websites edited by the data processor or Medicover: medicover.hu or medicoverkorhaz.hu, medicoverdiagnosztika.hu, medicoverszuleszet.hu, cafeteria.medicover.hu, or mysurgeryabroad.com, or through other web interface such as Chatbox).</p> <p>When sending a client satisfaction questionnaire or requesting an assessment for a service already fulfilled by Medicover, your name and e-mail address.</p>   |

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| <b>Duration of the data management; erasure</b> | <p>In respect of the personal data of the contractual contact person, the data management lasts until the expiry of the period of limitation (claim enforcement deadline – 5 years) during the term and after the termination of the contract concerned.</p> <p>In case of other notifications, inquiries, questions that are not complaints, the duration of the data management is 1 year following the receipt of the inquiry (period of limitation), upon the expiry of which period the data will be erased, destroyed.</p> <p>In case of return of client satisfaction questionnaire or evaluation, the duration of the data management is 1 year (period of limitation), upon the expiry of which period the data will be erased, destroyed.</p> |
| <b>Categories of recipients, data transfer</b>  | <p>Medicover transmits the personal data to the following recipients:</p> <ul style="list-style-type: none"> <li>- to authorities, courts specified by law, upon the official inquiry, order thereof, based on the law;</li> <li>- to its data processor providing document archiving, document storage services, based on data processing contract.</li> </ul> <p>The data provided on the websites operated by Medicover may also be accessed by the creator, editor of the website concerned, as the data processor of Medicover.</p>  |
| <b>Consequence of failure to provide data</b>   | <p>In the absence of contact person data, correspondence becomes impossible.</p>  |

### **E. Management of the data of persons applying to job advertisements and data management related to recruitment database**

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| <b>Purpose of the data management</b>     | <p>Filling vacant positions, establishment of own recruitment database.</p>  |
| <b>Legal basis of the data management</b> | <p>The legal basis of the data management is your consent as applicant, which you grant Medicover by submitting your application (GDPR Article 6(1)(a)).</p> <p>In other cases the legal basis is the legitimate interest of Medicover related to filling the vacant positions (GDPR Article 6(1)(f)).</p> |

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| <b>Scope of the personal data concerned</b>     | <p>In case of applicants, the data received directly from the applicant or through any of the employment websites:</p> <ul style="list-style-type: none"> <li>- name;</li> <li>- contact data (telephone number, e-mail address);</li> <li>- all personal data disclosed by the applicant in his/her curriculum vitae in connection with his/her application.</li> </ul> <p>In case of persons included in the recruitment database of Medcover:</p> <ul style="list-style-type: none"> <li>- name;</li> <li>- and the personal data which the data subject publishes regarding himself/herself on the social networking sites, employment websites (e.g. data related to qualification, professional practice).</li> </ul> |
| <b>Duration of the data management; erasure</b> | <p>In case of unsuccessful application, 2 years after the submission of the application, and in case of persons included in the recruitment database, 2 years after the entry of the data into Medcover's own recruitment database. Afterwards, the data will be erased, destroyed.</p>   |
| <b>Categories of recipients, data transfer</b>  | <p>The personal data of the applicants, as well as the data of the persons included in its own recruitment database may be transferred by Medcover to its subsidiaries, as well as to Medcover Försäkrings AB (Publ) Branch Office in Hungary.</p>  |
| <b>Consequence of failure to provide data</b>   | <p>Regarding applicants, incomplete data provision does not allow the application to be evaluated successfully.</p>   |

#### **F. Newsletter service, contact for direct marketing purposes**

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| <b>Purpose of the data management</b>           | <p>Direct marketing, promotion of the services of Medcover, facilitating the use of the services of Medcover.</p>                               |
| <b>Legal basis of the data management</b>       | <p>Your consent as data subject, and the legitimate interest of Medcover related to direct marketing.</p>                                       |
| <b>Scope of the personal data concerned</b>     | <p>The following data provided by you as data subject:</p> <ul style="list-style-type: none"> <li>- name,</li> <li>- e-mail address.</li> </ul> |
| <b>Duration of the data management; erasure</b> | <p>Medcover manages the personal data until objection to the data management or the withdrawal of the consent.</p>                              |

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| <b>Categories of recipients, data transfer</b> | Medicover transfers the personal data exclusively to authorities, courts specified by law, upon the official inquiry, order thereof, based on the law. |
| <b>Consequence of failure to provide data</b>  | In case of failure to provide data, the newsletter service cannot be provided.   |

### **G. Data management related to the operation of the electronic property security system**

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| <b>Purpose of the data management</b>           | For the purpose of property security, Medicover operates camera system in the Medicover Hospital (H-1134 Budapest, Váci út 29-31.), on the premises of the Medicover Eiffel Clinic (H-1062 Budapest, Teréz krt. 5557.) and the Medicover Clinic - Szeged (H-6723, Szeged, Felső Tisza - Part 25.), in the client waiting rooms. No cameras are installed in the examination and consultation rooms, and in the hospital rooms. |
| <b>Legal basis of the data management</b>       | The legal basis of the data management is the consent of the data subject, which is granted by entering the rooms monitored by cameras, as well as the legitimate interest of Medicover related to property security.  |
| <b>Scope of the personal data concerned</b>     | In this regard the personal data managed by Medicover are the video recordings made of the data subject, the behaviour of the data subject seen in the record, as well as the data and time of the recording.  |
| <b>Duration of the data management; erasure</b> | In accordance with Act CXXXIII of 2005 on The Rules of Personal and Property Security Activity and Private Investigator Activity, in the absence of use by any authority or court, Medicover erases the record after three working days calculated from the recording.   |
| <b>Categories of recipients, data transfer</b>  | Medicover transfer the camera record exclusively to authorities, courts specified by law, upon the official inquiry, order thereof, based on the law.  |
| <b>Consequence of failure to provide data</b>   | In case of failure to provide data, no service may be provided at those healthcare service sites where cameras are installed.  |

Medicover stores the camera records solely in its closed premises, on its own servers, while taking increased data security measures. The record cannot be accessed by unauthorized persons, only by its employees, contributors of Medicover and those data processors of Medicover which fulfil the property security tasks (based on data processing contract), to the extent necessary to fulfil their

tasks. You as data subject may request that Medicover shall not destroy the camera record until the inquiry of the court or authority, but for no more than 30 days, provided that it is necessary for the enforcement of your right or legitimate interest (e.g. in order to investigate the circumstances of any possible criminal offence). You as data subject may request a copy of only those camera records which do not show any other person or in which no other person is recognizable.

### **H. Data management related to profiles created on social networking websites**

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| <b>Purpose of the data management</b>           | The operation, moderation of the social network profiles (Facebook, LinkedIn) of Medicover, the presentation of the services of Medicover, the continuous improvement of the services of Medicover through the analysis of the traffic data.   |
| <b>Legal basis of the data management</b>       | <p>On the one hand, the legal basis of the data management is your consent as data subject, which you grant by e.g. entering the website, or writing opinions or comment made to the posts of Medicover (GDPR Article 6(1)(a)).</p> <p>On the other hand, the legitimate interest of Medicover related to the appropriate operation, moderation of its social networking profile (e.g. related to deleting offensive comments) (GDPR Article 6(1)(f)).</p> |
| <b>Scope of the personal data concerned</b>     | Name and all the personal data which the data subject publishes about himself/herself on the social networking sites and related to his/her Medicover social networking profile, or writes in any comment.   |
| <b>Duration of the data management; erasure</b> | After the expiry of 5 years (general period of limitation) calculated from the entry to the website or the writing of the comment at the latest, the personal data (including the comments) will be erased.  |
| <b>Categories of recipients, data transfer</b>  | The data obtained by Medicover in connection with the operation of its profile pages created on the social networking will not be transferred by Medicover to any party.   |
| <b>Consequence of failure to provide data</b>   | The failure to provide data has no consequence.  |

### 3. Information you should know about cookies

#### A. What are cookies?

A cookie is a small data which is put on your device (computer, telephone, tablet) when visiting or browsing a website.

Cookies could serve various purposes. Most commonly, cookies collect data on the use and traffic of the website visited in order to improve the user experience, and in the interest of placing targeted advertisements.

Cookies are not suitable for identifying the visitor of the website personally, they are suitable solely for recognizing the device (computer, telephone, tablet) of the visitor. Cookies are also not suitable for running programmes or viruses.

#### B. For which purposes and what kind of cookies are used by the websites operated by Medcover?

Medcover uses cookies on the following websites which are operated by Medcover:

- medicover.hu
- medicoverdiagnosztika.hu
- medicoverkorhaz.hu
- [medicoverszuleszet.hu](http://medicoverszuleszet.hu)
- hirek.medicover.hu
- cafeteria.medicover.hu
- mysurgeryabroad.com, and
- online.medicover.hu

In respect of the above websites, Medcover uses the following external cookies originating from third parties, i.e. cookies which were created not by Medcover but by an external service provider.

| Cookie                 | Function of the cookie and the data collected by the cookie  |
|------------------------|--|
| Google Adwords cookies | These cookies collect data about the visits to the websites of Medcover (e.g. the sub-sites visited). For remarketing purposes, i.e. these cookies allow targeted Medcover advertisements to be displayed for you on other websites, based on your visits to the websites of Medcover. |

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|--------------------------|--|
| Google Analytics cookies | These cookies collect statistical data on the visits to the websites of Medicover in order to prepare analyses on the use and traffic of the websites (e.g. subs-sites visited, number of visitors, their approximate geographic location, etc.). Medicover uses the statistical data obtained through the Google Analytics service about the traffic and the use of the website for developing the websites of Medicover. |
| Facebook cookies         | These cookies collect statistical data on the use of the websites of Medicover as well (e.g. subs-sites visited), in order to allow targeted Medicover advertisements to be displayed for you on the surface of Facebook.  |

You may find further information about the above cookies on the following websites:

<https://policies.google.com/technologies/types>

[https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-](https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage)

[usage https://www.facebook.com/help/cookies/](https://www.facebook.com/help/cookies/)

### **C. How long are cookies stored and how can they be deleted?**

The above cookies are placed on your device used for browsing, upon your approval given during visiting the websites of Medicover, i.e. with your consent. Their life span varies, but cookies are automatically deleted after 2 years of the placement thereof at the latest. At the same time, you may delete the cookies at any time, and you may at any time set your browser so that it blocks the use of cookies. At the following links, you may get information on the deletion and blocking of cookies in case of the most commonly used browsers.

[Google Chrome](#)

[Firefox](#)

[Microsoft Internet Explorer](#)

However, if you block the cookies, the Medicover websites may function not as planned and not optimally in your browser.

### **4. Which rights may be exercised related to the management of personal data?**

You have the right to:

- information, access to your personal data, request copies
- the rectification of your personal data,
- withdraw your consent granted to the data management, the erasure of your personal data, i.e. 'to be forgotten',
- object to the data management,
- restrict the data management, - data portability, and
- legal remedy.

## **A. Right to information**

In addition to the information detailed in Section 2, using the contact details provided in Section 1, you may request specific information related to you from Medcover regarding whether Medcover manages any of your personal data, for which purpose and on what legal basis, for how long, as well as you may request information as to how Medcover obtained your personal data, whether Medcover transferred or provided access to the personal data to any third party, and if yes, then to whom, when, for what purpose. You may also request concrete information on your rights related to the data management. Medcover provides the information for free, however, where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, then – using the opportunity provided by the applicable law – Medcover may (taking into account the administrative costs of providing the information or communication or taking the action requested) charge a reasonable fee or may refuse to act on the request for information.

You may request to be provided with the copy made of your personal data, in electronic or other (in particular paper) format, as consideration of which – using the opportunity provided by the applicable law – Medcover may charge a reasonable fee (based on administrative costs).

Medcover will fulfil with your request for information while respecting the rights of others (in particular the trade secret and the right to the protection of intellectual property).

## **B. Right to rectification**

If you become aware that any of your personal data (therefore in particular e.g. contact data, e-mail address, telephone number) managed by Medcover and stored in its system is incorrect (e.g. due to typo) or incomplete, then upon your request sent to the contact details specified in Section 1, Medcover will amend your incomplete personal data in its systems, and will rectify your incorrect personal data. In addition, Medcover will also notify all those third parties of the rectification to whom Medcover transferred your personal data, except if it is impossible or would require disproportionate effort.

## **C. Withdrawal of the consent granted to the data management; right to erasure, 'to be forgotten'**

You may withdraw your consent to the data management granted at any time, which however does not affect the lawfulness of the data management preceding the withdrawal.

If you withdraw your consent to the data management granted and

- there is no other legal basis for the data management, or
- the purpose of the data management ceased, or
- if the data management is unlawful, or
- the data shall be erased under the law, then upon your request sent to the contact details specified in Section 1, Medcover will erase your personal data from its systems or will destruct your personal data permanently. In addition, Medcover will also notify all those third parties of the erasure to whom Medcover transferred your personal data, except if it is impossible or would require disproportionate effort.



## **D. Right to object**

If the data management is based on the legitimate interest of Medicover or any other third party, then you have the right to object to the data management through the contact details specified in Section 1, in which case Medicover will no longer manage your personal data, except if the data management is justified by any compelling legitimate ground.

## **E. Restriction of the data management**

Through the contact details specified in Section 1, you may request the restriction of the data management related to your personal data, in which case Medicover may only store your personal data without using those or carrying out further data management operations (e.g. transfer, erasure); the latter may occur during the restriction only if you granted your consent thereto, if those are necessary for exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. In addition, Medicover will also notify all those third parties of the restriction to whom Medicover transferred your personal data, except if it is impossible or would require disproportionate effort.

You may request the restriction of the data management if

- with regard of your opinion the accuracy of your personal data, and you do not want your personal data to be used by Medicover until those are rectified, or
- in your opinion, the data management is unlawful, or
- the purpose of the data management carried out by Medicover ceased, however, you do not want your data to be erased, because you need those for e.g. lodging, defending or enforcing your legal claim.

You may request the restriction simultaneously with the objection to the data management based on the legitimate interest of Medicover or any other third party, in which case the restriction shall apply until the assessment of the request for objection at the latest.

## **F. Data portability**

If the data management is based on your consent, or if data management is necessary for the fulfilment of the contract concluded with you, or if the data management is carried out by automated means, then through the contact details specified in Section 1, you may request that solely those personal data which you provided to Medicover and which are related to you be transferred in a structured, commonly used and machine-readable format to you or another data controller specified by you, and in case of data concerning health, subject release from medical confidentiality. Medicover will comply with your request for information while respecting the rights of others (in particular the trade secret and the right to the protection of intellectual property).

## **5. How can you enforce the rights related to data management?**

You may submit your inquiry or request for exercising your rights related to the data management detailed above to the contact details specified in Section 1. Please provide at least two of your personal data in your request, with which Medicover can identify you (e.g. name and telephone number, name and e-mail address). You may make your request or observation verbally as well, via the telephone number specified in Section 1, however, Medicover will in any case reply or provide

information in writing (primarily in the form chosen by you, or in the absence thereof, subject to the discretion of Medicover, electronically via e-mail or on paper, by mail). In your written request (submitted via e-mail or on paper), please specify in which form you would like to receive the reply (electronically via e-mail or on paper, by mail), otherwise Medicover will forward the reply to you in the form consistent with your request. Medicover will provide a reply on the merits of your request or inquiry related to data management within 30 days of the receipt thereof, or within 60 days in exceptional cases (e.g. considering the complexity of the request). In the latter case Medicover will notify you separately of the extension of the deadline for reply and the reasons for the extension, within 1 month of the receipt of the request.

**A. I am not of legal age yet; how should I proceed?**

If you are not 16 years old yet, then you may enforce the rights detailed above with the approval of your legal representative – i.e. most commonly your parent who exercises the parental rights. If you are over the age of 16 but below the age of 18, then you may grant consent to the data management independently, however, you may exercise the rights detailed above only with the approval of your legal representative, i.e. most commonly your parent who exercises the parental rights.

**B. Which rights may be exercised related to the personal data of deceased relatives?**

For 5 years following the death of the data subject, the person authorized by the data subject during his/her life in public document or in private document of full probative value may in respect of the personal data of the data subject exercise the rights to information, rectification, erasure, objection and the right to restrict the data management. If the data subject did not authorize anybody during his/her life, then for 5 years following his/her death, his/her close relative (from among the spouse, next of kin, adopted children, stepchildren, foster children, adoptive parents, stepparents, foster parents, and siblings as close relative the person who acts first) shall be entitled to exercise the right to rectification and objection, as well as in case the data management had already been unlawful in the of the data subject, or if the purpose of data management ceased upon the death of the data subject, then the close relative may also exercise the right to erasure and the right to restrict the data management. Medicover shall reply to any inquiry, request related to the personal data of the deceased and received from the person authorized to submit such inquiry, request within 25 days of the receipt thereof.

**6. Which legal remedied are available? – Data protection officer, supervisory authority, court**

In all matters related to data management and to exercising the rights detailed above, as well as regarding the reply given by Medicover to data management requests and inquiries, you may contact the data protection officer of Medicover, through the following contact details:

| <b>The data protection officer of Medicover</b> |  |
|---|--|
| Name:   | Ildikó SALAMON   |
| E-mail address:                                 | <a href="mailto:dpo@medicover.hu">dpo@medicover.hu</a> |

|                  |                                 |
|------------------|---------------------------------|
| Mailing address: | H-1134 Budapest, Váci út 29-31. |
|------------------|---------------------------------|

In connection with the data management carried out by Medcover you may lodge a complaint to the data protection supervisory authority, i.e. to the Hungarian National Authority for Data Protection and Freedom of Information, through the following contact details:

|  |   |
|--|---|
| <b>Nemzeti Adatvédelmi és Információszabadság Hatóság</b><br>(Hungarian National Authority for Data Protection and Freedom of Information) |   |
| Registered seat:   | H- 1055 Budapest,<br>Falk Miksa utca 9-11.  |
| Mailing address:   | H- 1363 Budapest, Pf.: 9.                   |
| E-mail address:  | ugyfelszolgalat@naih.hu                     |
| Telephone number:  | +36 (1) 391-1400                            |
| Website:   | <a href="http://naih.hu">http://naih.hu</a> |

In addition to the above, you may refer to the court in order to enforce your rights and claims related to data management. You may initiate the litigation proceeding before the court of your place of residence or place of stay as well.

Budapest, 13<sup>th</sup> December 2024

Medcover