

Data Privacy Notice for Patients

Affidea is a medical services provider with high ethical standards. "Affidea" means Affidea sp. z o. o., with its registered office in Warsaw, (00-844), Pl. Europejski 2.

1. Legal basis for processing of your personal data

We are committed to protecting and processing your personal data and we are required to do so by law. Our medical professionals are subject to a professional duty of maintaining confidentiality of your data.

It is necessary for us to use your personal data, including health data, so that we can provide you with the requested medical service.

Processing of your basic personal data (e.g. name and contact details) is necessary for scheduling your appointment and for the delivery of the medical services you need. The **medical service agreement** constitutes the legal basis for processing of your basic personal data.

Your health data covers information related to your health status, information about a requested diagnosis/treatment and our health assessment. Providing you with a **medical diagnosis and/or medical treatment** (including our duty to maintain the medical records) forms our legal basis for processing of your health data. If you are in an extreme or life-threatening condition while present at one of our clinics, we will use your health data in order to preserve your health and well-being, and on the basis of **protecting your vital interests**.

We are constantly improving our services.

At Affidea we are always searching for better ways to provide our services.

If you do not mind being contacted after your visit, we will process your data for the purposes of so-called Patient satisfaction survey. Participation in such a survey does not affect services we provide to you. The aforementioned activity is carried out for our **legitimate interest** involving identifying potential improvements to our business.

2. Data we process

During your relationship with Affidea, we obtain your personal data from three sources: (1) from you, (2) from others and (3) from our medical activity.

(1) In order to provide you with medical service you need, we ask you to provide us with your basic personal data (especially your personal identification data), your payment and insurance data (data necessary in order to pay for our service) and your health data (in particular, information about your health status). If you decide to make available previous images and medical reports to us to use, we will store and process these on our systems for the purposes of your medical diagnosis and/or medical treatment. If you voluntarily supply contact information of your next of kin or family, this data will only be used when we are unable to contact you, or in the event of an emergency.

(2) We collect personal data from others in the following instances:

a) If you are referred to our clinic by a medical provider (referring doctor or hospital), we consult this person about your health condition and/or treatment, if necessary to find the most appropriate medical service for you.

Affidea sp. z o.o.

Plac Europejski 2
00-844 Warszawa

T: +48 22 526 11 00/01
Fax: +48 22 526 11 99

affidea.pl
polska@affidea.com

Kapitał zakładowy:
16.966.500,00 PLN

NIP 107 00 08 817
REGON 141150948
KRS: 0000289698



b) If the medical diagnosis and/or medical treatment we provide to you are paid for by a medical insurer (either public or private) we need to check your insurance cover before we provide the medical service to you.

(3) When providing your medical diagnosis and/or medical treatment, we are generating health data about you. As a medical services provider, Affidea is required by law to carefully document the service provided to you, in the medical records.

For further information about the data we process, please see the Annex to this notice or ask one of our receptionists.

3. How long we retain your data for

Affidea retains your personal data for a period necessary for the purposes of the provision of medical services and ensuring compliance with applicable medical (i.e. until the expiry of the obligatory period of storage of the medical records), tax, accounting or other legislative requirements. If our legal obligation to retain your data ends, we will delete your data or anonymise it. Anonymization describes a process on personal data (or a set of personal data) that makes it permanently impossible to identify the person to whom the personal data related to. Affidea will not delete or anonymise your data if an alternative lawful basis for keeping it is identified, for example, Affidea's legitimate interest to defence against claims. If this is the case, we will contact you.

For further information about how long we keep your data, please see the Annex of this notice or ask one of our receptionists.

4. Who we share your data with

During your relationship with Affidea, we share your personal data with three different types of recipients: (1) with providers instructed by us, (2) with providers independent from us and (3) with people you request us to share data with.

(1) Affidea uses service providers (so-called data processors) to assist us in processing the personal information we receive and create (for example medical and financial software and hardware vendors, contracted medical professionals, providers of paper document storage). The data processors act on behalf of Affidea based on our written instructions. We only share your data that is absolutely necessary.

(2) We share your personal data with third parties (meaning recipients independent from us) in the following instances:

- a) if we are required by law;
- b) if needed to perform our obligations with a medical professional or insurer you have a contract with;
- c) if the protection of your vital interest so requires, we will share your health data with other medical professionals.

We only share your data that is absolutely necessary.

(3) You may request that we send your health data to your referrer or your family doctor. If you wish to ask us to share your data with someone, we kindly suggest enquiring about how and why this person would process your personal data first. The processing activities of third party recipients are outside our control and responsibility. If you want us to share your health data with other medical professionals, please consult our receptionists about the available means for such data transmission.

For further information about the recipients of your personal data please see the Annex of this notice or ask one of our receptionists.

Affidea sp. z o.o.

Plac Europejski 2 T: +48 22 526 11 00/01 affidea.pl Kapitał zakładowy: NIP 107 00 08 817
00-844 Warszawa Fax: +48 22 526 11 99 polska@affidea.com 16.966.500,00 PLN REGON 141150948
Sqł Rejonowy dla m. st. Warszawy w Warszawie, XII Wydział Gospodarczy Krajowego Rejestru Sądowego KRS: 0000289698



5. Transfer of data to third countries

It might be needed to share your personal data with recipients located outside the European Economic Area. Before transferring your data in such a way, your data is safeguarded as we ensure (1) the recipient country is covered by an adequacy decision of the European Commission; and (2) that so-called Binding Corporate Rules or EU standard contractual terms are used. If we need to transfer your data to a country not covered by an adequacy decision of the European Commission, we will inform you about this transfer in advance.

For further information about the location of your personal data, please see the Annex of this notice or ask one of our receptionists.

6. Keeping your data safe

Keeping your data safe is our priority. Your personal data is stored securely by us, or by our carefully selected service providers. When our service providers process health data on our behalf, we require a high level of protection.

We make sure that very strict security measures are in place to keep your personal data safe against loss and misuse, as well as unauthorized access or transfer.

7. Your rights

Under data protection legislation you have the following rights.

- 7.1. *Right to request access to your personal data.* This means that you are entitled to know that your data are being processed and you are entitled to access your personal data processed by us and to being provided with information about what Affidea does with your personal data.
- 7.2. *Right to request rectification of your personal data.* It means that you are entitled to have your personal data corrected, completed if it is inaccurate or incomplete.
- 7.3. *Right to request erasure of your personal data.* It means that you are entitled to have your personal data deleted in specific circumstances, if there is no for lawful reason for continuing our processing.
- 7.4. *Right to request from us restriction of processing.* It means that you may request to 'block' or suppress processing of your personal data. Your valid request will mean that we will be allowed to store your personal data, but not to process it further.
- 7.5. *Right to data portability.* It allows you to access and reuse your personal data that you have provided us for your own purposes across different services. You are entitled to receive and transfer an electronic copy of your personal data easily and to ask us to transfer it to another controller.
- 7.6. *Right to object.* This means that you have the right to object, on grounds relating to your particular situation, to processing of your personal data that we processed based on our legitimate interest.

If you wish to use your rights or wish to have further information about your rights above, please ask one of our receptionists or contact our Data Protection Officer (you can see the contact details below).

8. If you have any questions

If you have any questions or would like more information, please feel free to contact our Data Protection Officer (e-mail: iod@affidea.com, postal address: Affidea sp. z o. o., pl. Europejski 2, 00-844 Warszawa) or ask one of our receptionists for further information. In case of any reservations pertaining to the way we process your data, you can make a complaint to the President of the Office for the Protection of Personal Data. However, we would of course hope that you are able to raise any issues with us in the first instance.

Affidea sp. z o.o.

Plac Europejski 2
00-844 Warszawa

T: +48 22 526 11 00/01
Fax: +48 22 526 11 99

affidea.pl
polska@affidea.com

Kapitał zakładowy:
16.966.500,00 PLN

NIP 107 00 08 817
REGON 141150948

Sqd Rejonowy dla m. st. Warszawy w Warszawie, XII Wydział Gospodarczy Krajowego Rejestru Sądowego

KRS: 0000289698



Annex to Data Privacy Notice for diagnostic imaging

Below you can find further information about who we share your data with. We only share your data with other recipients if it is absolutely necessary.

Data recipients acting on behalf of (and instructed by) Affidea					
Industry	Sector of activity	Sub-Sector of activity	Type of activity	Category / Location of the recipient	
Medical	Medical Professionals	Health care services	Provision of medical services	External physicians and other health care professionals, acting based on our instructions	
	Medical consultants	Radiology	Provision of a second opinion, if necessary	Radiologists	
Services	Administration	Infoline operation	Scheduling appointments by telephone	Provider of contact centre services	
	Operation of medical equipment	Maintenance	Maintenance of medical equipment	Entities providing medical equipment maintenance services	
Information Technology	Electronic communication	E-mails	Operation and hosting of e-mail system	Provider of hosting of e-mail services	
	Administration software	Call centre software	Storing voice recordings of calls	Provider of contact centre services	
	Administration software	Operation and hosting of patient portal	Online booking	Providers of IT services	
	Medical software	Radiology information system	Patient registration, scheduling, examination data creation and diagnosis creation, billing support, distribution of medical report	Storage of diagnostic images	Providers of medical systems
		Picture archiving and communication system			
	Financial Software	Accounting	Billing of health costs	Financial software suppliers	
	Operation	Operation of IT infrastructure	Ensuring availability of data	Providers of IT services	
	IT support	User support	Ensuring availability of systems		
System support		Software maintenance			
Data storage	Back-up of data	Securing availability of data			
Security	Monitoring of premises	Monitoring system operation	Video recording	Providers of monitoring systems	

Affidea sp. z o.o.

Plac Europejski 2 T: +48 22 526 11 00/01 affidea.pl Kapitał zakładowy: NIP 107 00 08 817
 00-844 Warszawa Fax: +48 22 526 11 99 polska@affidea.com 16.966.500,00 PLN REGON 141150948
 Sqd Rejonowy dla m. st. Warszawy w Warszawie, XII Wydział Gospodarczy Krajowego Rejestru Sądowego KRS: 0000289698



Third party data recipients (acting independently from Affidea)				
Industry	Sector of activity	Sub-Sector of activity	Type of activity	Identity of the recipient
Health Insurance	Private health insurance	Financing	Confirmation of insurance coverage	Entities offering health Insurance
	National health insurance	Financing	Confirmation of insurance coverage	National Health Fund
		Operation of the national health insurance database	Storage of NHI financed medical files	
Finance	Banking	Payments	Payment processing by credit or debit card	Banks
Medical	Emergency medical services	-	Delivery of patients to or from our medical centre	Ambulance
	Treatment continuation	-	Referral of patients	Referring physician / medical organization
	Clinical Research Organization	Clinical research	Requests and uses clinical exam results, if you are participant of it	
Insurance	Service insurance	-	In case of a claim filed by you concerning our medical service	Insurance firms
Audit	External audit	-	Examination of quality standards	External auditors
Audit Communication	Financial audit	-	Verification of accounting records	Statutory auditors
	Postal services	-	Delivery of letters and other parcels	Polish Post, courier companies
Communication	Telephone services	-	Operation and hosting of the telephone system	Telecommunications operators
		-		

Affidea sp. z o.o.

Plac Europejski 2 T: +48 22 526 11 00/01 affidea.pl Kapitał zakładowy: NIP 107 00 08 817
 00-844 Warszawa Fax: +48 22 526 11 99 polska@affidea.com 16.966.500,00 PLN REGON 141150948
 Sqd Rejonowy dla m. st. Warszawy w Warszawie, XII Wydział Gospodarczy Krajowego Rejestru Sądowego KRS: 0000289698



Below you can also find further information about the type of data we process and about how long do we keep your data for.

Personal data processed				
Purpose of our data processing	Personal data type	Examples of personal data	Reasons for processing	Retention period
Medical service	Basic personal data	Name, NHI number, e-mail, mobile number	Scheduling of appointment, registration, identification of patient, keeping contact with patient	Period of limitation of claims related to services by lapse of time
	Financial and insurance details	Proof of insurance cover, credit card data	Financing and payment	Period of storage of accounting vouchers and period of limitation of claims pursued in court by lapse of time
	Medical data	Prescription issuance, historical medical records, diagnosis and/or treatment type and date	Patient safety, confirmation of correct medical procedure, production of medical diagnosis and planning medical treatment	Period of storage of medical records
	Other personal data	Identity of referring/family doctor	Contact other medical professional for further health care data for the best care	

Affidea sp. z o.o.

Plac Europejski 2 T: +48 22 526 11 00/01 affidea.pl Kapitał zakładowy: NIP 107 00 08 817
 00-844 Warszawa Fax: +48 22 526 11 99 polska@affidea.com 16.966.500,00 PLN REGON 141150948
 Sqd Rejonowy dla m. st. Warszawy w Warszawie, XII Wydział Gospodarczy Krajowego Rejestru Sądowego KRS: 0000289698

