

Tartalom

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PRIVACY POLICY

Processing of patient data Provision of health services

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
Contact details of data controller:	e-mail	info@dunamedical.com
	telephone	+36 1 790 7070
	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crosssec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crosssec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Identifier Patient's name Birth name Mother's birth name Place and date of birth Social security number Permanent address Mailing address Place of residence Billing address Health insurance fund/insurer E-mail address Phone number Any medical data related to the examination or intervention Details of the patient's legal representative: Name, birth name Mother's birth name Identifier Residence ID card number / Passport number - Nationality E-mail contact Phone number	Patient admission, patient identification, data recording, data verification, provision of health service, preparation and storage of patient documents, contact and information. Preparation of wristbands and necessary documents for surgeries and care requiring admission to a ward. Verification of the services in health and financial terms, transfer of necessary information related to financing within the institution or, in special cases, outside the institution (e.g., employer screening packages, care organizers, financing by insurer)	Necessary for performance of a contract and legal obligation – GDPR Articles 6(1)(b) and (c)	50 years from the date of recording.

Related legislation

Act CLIV of 1997 on health care
Act XLVII of 1997 on the processing and protection of health and related personal data

Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

Statutory representative of the data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Béker-Soft Informatikai Kft 73 Hengersor street 1184 Budapest, Medical system operation, teleradiology - Főnix-Pro, Terasy, Iconomix Kft 9B Koller Street, Ground Floor, Door 5, Pécs 7626 Teleradiology system - TeRaSy, Quantumread Kft 10 Erdőhegy street 1223 Budapest, Teleradiology system, SYNLAB Hungary Kft. 5-7 Weiss Manfréd road 1211 Budapest, Laboratory services contract, MEDSERV Health, Service and Trade Kft. 1047 Budapest, 56 Fóti road, Building A, Laboratory services contract, Philips Magyarország Kft. 1 Alíz street 1117 Budapest, CT, Perinatal, Intellispace portal system, Hospitaly Kft. 29 Szobránc street Budapest, 1143, On-Line – Surgical appointment system, Medio MedTech Zrt. 2 Lechner Ödön alley 7. floor 13. 1095 MyMedio system, booking system, Medport 15 Budafoki road ground floor 6, 1111 Budapest, Orthopedic collaborative partner, IQB Medical Kft. 63/B Kútvolgyi road 1125 Budapest, Surgical collaborative partner
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	The different areas have the necessary levels of authorization to carry out their work, with access to health data restricted to those involved in the provision of health services.
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations	
<i>Right to information</i>	- Data Subject shall have the right to find out the way personal data is handled before data processing begins
<i>Right to rectification</i>	- Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.
<i>Right of access</i>	- Data Subject shall have the right to request for personal data stored about him/her from the data controller.
<i>Right to data portability</i>	- The data subject shall have right to request their personal data stored in digital tabular form.
<i>Right to review of automated individual decision-making</i>	- Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Processing of patient data Mandatory data reporting

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

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Contact details of data protection officer (if available)		E-mail: gdpr@crosssec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Patient's name Birth name Mother's birth name Place and date of birth Social security (TAJ) card number Permanent address Mailing address Place of residence Disease data, health data, diagnosis, data on the findings	EESZT (Electronic Health Service Space), OSZIR (National Social Information System) data reporting To comply with legal obligations, transfer of patient data, uploading health documents, mandatory data reporting, epidemiological reports	Necessary to comply with a legal obligation – GDPR Article 6(1)(c)	The data are stored in the EESZT system for 10 years after the death of the data subject. - Detailed storage times are available in the EESZT Privacy Notice, see https://www.eeszt.gov.hu/documents/20182/36430/EESZT_Lakossagi_adatkezesi_tajekoztato_20230828.pdf/a105eae6-951f-b82a-b707-f06dd441dc17

Related legislation

EMMI Decree 1/2014. (I. 16.) on the order of reporting communicable diseases
 EMMI Decree 39/2016 (XII. 21.) on the detailed rules related to the EESZT
 EMMI Decree 49/2018 (XII. 28.) on the scope of diseases of major public health importance or otherwise entailing a significant costs, the designation of the body managing the disease register recording the diseases, and detailed rules for the notification and registration of these diseases

Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

Statutory representative of the data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	
Recipients	ESZFK Egészséginformatikai Szolgáltató és Fejlesztési Központ Nonprofit Kft. 11 Könyves Kálmán boulevard building B 1st floor 1097 Budapest, Healthcare IT provider and Development Center - EESZT system,

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	Only doctors have access to the EESZT system
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins <i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it. <i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller. <i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form. <i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Processing of patient data Release of patient documents

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
Contact details of data controller:	e-mail	info@dunamedical.com
	telephone	+36 1 790 7070
	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crosssec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crosssec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Patient's name, social security number, place and date of birth, e-mail address, address, phone number Content of patient documents and findings, diagnosis (radiological images, findings, outpatient records, etc.)	Sending medical documents electronically or by post, patient identification in case of personal delivery	Necessary for performance of a contract and legal obligation – GDPR Articles 6(1)(b) and (c)	50 years from the date of recording.

Related legislation

Act CLIV of 1997 on health care
Act XLVII of 1997 on the processing and protection of health and related personal data

Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

The data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Béker-Soft Informatikai Kft 73 Hengersor street 1184 Budapest, Medical system operation, teleradiology - Főnix-Pro, Iconomix Kft 9B Koller Street, Ground Floor, Door 5, Pécs 7626 Teleradiology system - TeRaSy, Quantumread Kft 10 Erdőhegy street 1223 Budapest, Teleradiology system, SYNLAB Hungary Kft. 5-7 Weiss Manfréd road 1211 Budapest, Laboratory services contract, MEDSERV Health, Service and Trade Kft. 1047 Budapest, 56 Fóti road, Building A, Laboratory service accordance with the contract, Philips Magyarország Kft. 1 Alíz street 1117 Budapest, CT, Perinatal, Intellispace portal system, Hospitaly Kft. 29 Szobránc street Budapest, 1143, On-Line – Surgical appointment system, Medio MedTech Zrt. 2 Lechner Ödön alley 7. floor 13. 1095 MyMedio system, booking system, Patient pathway management and Telemedicine service, Medport 15 Budafoki road ground floor 6, 1111 Budapest, Orthopedic collaborative partner, IQB Medical Kft. 63/B Kútvölgyi road 1125 Budapest, Surgical collaborative partner
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	Medical documents are issued only by a doctor or medical assistants and administrators.
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Processing of patient data Radiological, medical devices

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
Contact details of data controller:	e-mail	info@dunamedical.com
	telephone	+36 1 790 7070
	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crosssec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crosssec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Patient's name, social security number, date of birth Medical images, related health data	Storage of images taken by radiological and medical equipment, their synchronization with the patient management system, security backup of data	Data necessary for the performance of the contract – GDPR Article 6(1)(b)	10 years from the date of the recording

Related legislation

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Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

The data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Béker-Soft Informatikai Kft 73 Hengersor street 1184 Budapest, Medical system operation, teleradiology - Főnix-Pro, Képdoktor Kft 13 Városmajor street 1122 Budapest, Medical system operation - eRad Radiology system, Iconomix Kft 9B Koller Street, Ground Floor, Door 5, Pécs 7626 Teleradiology system - TeRaSy, Quantumread Kft 10 Erdőhegy street 1223 Budapest, Teleradiology system, Philips Magyarország Kft. 1 Alíz street 1117 Budapest, CT, Perinatal, Intellispace portal system
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	The different areas have the necessary levels of authorization to carry out their work, with access to health data restricted to those involved in the provision of health services.
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
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Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Processing of patient data Quality management

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

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	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crossec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crossec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Name Job title Signature Verifying data in the documented information	Improving the quality of patient safety Operation, control and continuous improvement of the quality management system according to the standards MSZ EN 15224:2013 and MSZ EN ISO 9001:2015, preparation of documented information, certificates, arranging internal audits and external certifications	Legitimate interest – GDPR Article 6(1)(f)	5 years

Related legislation

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Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

Statutory representative of the data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	
Recipients	Émi Tűv Süd Kft 26 Dózsa György road 2000 Szentendre, Auditing firm

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	Access to data relating to quality management is restricted to staff responsible for quality management in order to carry out their work.
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to object</i> - If the legal basis is based on legal interest or on public authority, the data subject shall have right to object processing their personal data, but it does not mean immediate erasure of their data.</p> <p><i>Right to restriction of processing</i> - If the data subject does not consider the controller authorized, they can request the suspension of data processing during the investigation.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Processing of patient data Contracting

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
Contact details of data controller:	e-mail	info@dunamedical.com
	telephone	+36 1 790 7070
	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crosssec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crosssec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Patient's name Unique internal identifier Signature	Defining the conditions for medical interventions and treatments, recording associated responsibilities	Data necessary for the performance of the contract – GDPR Article 6(1)(b)	50 years from the date of recording; contracts for health services for are part of the patient file.

Related legislation

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Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

Statutory representative of the data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Hospitály Kft. 29 Szobránc street Budapest, 1143, On-Line – Surgical scheduling system
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	Reception, administrative staff, staff involved in the provision of health services and the finance staff have access to the data processed
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Processing of the data of relatives Processing of the data of parents, statutory representatives

Applicable from 1th Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
Contact details of data controller:	e-mail	info@dunamedical.com
	telephone	+36 1 790 7070
	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crossec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crossec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Name and birth name of the patient's statutory representative Mother's birth name Identifier Residence ID card number / Passport number - Nationality E-mail contact Phone	In the case of minor or incapacitated patients, administration related to patient admission, patient identification, data recording, data verification, provision of health care services, preparation and storage of patient documents, communication and provision of information.	Necessary to comply with a legal obligation – GDPR Article 6(1)(c)	50 years from the date of recording, as the relevant documents are part of the patient record.

Related legislation

Act V of 2013 on the Civil Code

Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

The data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Béker-Soft Informatikai Kft 73 Hengersor street 1184 Budapest, Medical system operation, teleradiology - Főnix-Pro, Terasy
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	The different areas have the necessary levels of authorization to carry out their work, with access to health data restricted to those involved in the provision of health services.
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence— according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Processing of patient data Data exchange with service organizers, insurers

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
Contact details of data controller:	e-mail	info@dunamedical.com
	telephone	+36 1 790 7070
	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crosssec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crosssec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Client name Client's date of birth Exact description of the proposed intervention OENO (ICHI = International Classification of Health Interventions) code of planned intervention Date of planned intervention Planned length of stay (will it be more than 24 hours or not?) Cost of surgery, intervention, treatment and other costs Is a covid test necessary? (Please state if you cannot tell yet, because it depends on vaccination/certificate of vaccination etc.)	In connection with the financing of services: contracting, forwarding service and patient data to the insurer or the service organizer partner, paying the fees for services and necessary communication.	Data necessary for the performance of the contract – GDPR Article 6(1)(b)	50 years from the date of recording.

Related legislation

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Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization

No	
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If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

Statutory representative of the data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Béker-Soft Informatikai Kft 73 Hengersor street 1184 Budapest, Medical system operation, teleradiology - Főnix-Pro, Terasy, Epicor Software Corporation Las Cimas II- 807 Las Cimas Parkway, Suite 400 Austin, TX 78746, USA Accounting system - iScala ERP
Recipients	Teladoc Hungary Kft 26-32 Szigony street 1083 Budapest, Healthcare provider (Insurance company), Union-Érted Ellátásszervező Kft. 1 Baross street 1082 Budapest, Healthcare provider (Insurance company),

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission
Epicor Software Corporation, Privacy Policy, https://www.epicor.com/en-us/company/compliance/privacy/

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	Reception, assistants, finance, call center, customer service, case managers
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to erasure ('right to be forgotten')</i> - The data subject has the right to request the permanent deletion of his / her data, unless the data processing is based on the performance of a contract, the fulfillment of a legal obligation or a public authority license.</p> <p><i>Withdrawal of consent</i> - The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.</p> <p><i>Right to restriction of processing</i> - If the data subject does not consider the controller authorized, they can request the suspension of data processing during the investigation.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Processing of patient data Preparation of financial documents

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
Contact details of data controller:	e-mail	info@dunamedical.com
	telephone	+36 1 790 7070
	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crosssec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crosssec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Name Social security number Address Insurance company's details (optional) Invoice serial number Costs of services used EP (health fund) card details (owner's name, member ID, beneficiary's name) – optional	Issuing an invoice/proforma invoice for the health services received to the person concerned, or his/her representative or, possibly, to the organization bearing the costs, and sending the document electronically or by post.	Necessary to comply with a legal obligation – GDPR Article 6(1)(c)	8+1 years from the date of payment of the invoice

Related legislation

Act CXXVII of 2007 on Value Added Tax
NGM Decree 23/2014. (VI. 30.) on the tax administration identification of invoices and receipts and the audit of electronically stored invoices by the tax authority (hereinafter, the "Invoice Decree") and NGM Decree No 48/2013. (XI. 15.) on the technical requirements of cash registers, the distribution, use and servicing of cash registers for issuing receipts, and the provision of data recorded by cash registers to the tax authority
Act C of 2000 on accounting

Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

Statutory representative of the data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Béker-Soft Informatikai Kft 73 Hengersor street 1184 Budapest, Medical system operation, teleradiology - Főnix-Pro, Terasy, Hospitaly Kft. 29 Szobránc street Budapest, 1143, On-Line – Surgical appointment system, NATURASOFT Hungary Kft. 37 Hamzsabégyi road 1114 Budapest, billing, Epicor Software Corporation Las Cimas II- 807 Las Cimas Parkway, Suite 400 Austin, TX 78746, USA Accounting system - iScala ERP Magyar Szakértői Holding Kft. 8 Beregszász road C401, 1118 Budapest, auditor
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission
Epicor Software Corporation, Privacy Policy, https://www.epicor.com/en-us/company/compliance/privacy/

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	Receptionists, medical assistants and finance staff have access to the data in order to carry out their duties.
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Processing of patient data Data processing related to financial performance

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
Contact details of data controller:	e-mail	info@dunamedical.com
	telephone	+36 1 790 7070
	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crosssec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crosssec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Name Bank account number E-mail address EP card details	Payment of the bill / proforma invoice for the health services used, its registration (if in cash, with cashier's documentation, in case of payment by bank card or transfer through the systems used, via the insurance company or health insurance fund).	Data necessary for the performance of the contract – GDPR Article 6(1)(b)	8+1 years from the date of payment of the invoice

Related legislation

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Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

Statutory representative of the data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Epicor Software Corporation Las Cimas II- 807 Las Cimas Parkway, Suite 400 Austin, TX 78746, USA Accounting system - iScala ERP Magyar Szakértői Holding Kft. 8 Beregszász road C401, 1118 Budapest, auditor Raiffeisen Bank Zrt. 116-118. Váci road 1133 Budapest, Banking services, K&H Bank 9 Lechner Ödön alley 1095 Budapest, Banking services OTP Mobil Kft. 135-139. Váci út building B. 5th floor 1038 Budapest, SimplePay - online payment platform, Worldline S.A. (former name: Six Payment Services) Tour Voltaire, 1 Place des Degrés, CS 81162, 92059 Paris la Défense Cedex, France, bank card payment - terminals
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission
Epicor Software Corporation, Privacy Policy, https://www.epicor.com/en-us/company/compliance/privacy/

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	Receptionists, medical assistants and finance staff have access to the data in order to carry out their duties.
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Processing of patient data Marketing, sending offers, newsletters

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
Contact details of data controller:	e-mail	info@dunamedical.com
	telephone	+36 1 790 7070
	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crosssec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crosssec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Name E-mail address Phone number Date of subscription	Sending electronic mail for marketing purposes to people interested in news, novelties – offers to be sent by DMC – subscribers to the newsletter on the websites or on paper.	Consent of the data subject – GDPR Article 6(1)(a)	Until the consent is withdrawn, but for a maximum of 20 years. (the data retention period can be extended by renewing the data subject's consent)

Related legislation

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Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

The data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Zoho Corporation 4141 Hacienda Drive, Pleasanton, CA 94588 USA Telemarketing service, Zoho CRM system
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission
Zoho Corporation, USA, Privacy Policy, https://www.zoho.com/privacy.html , data storage

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	The staff in the marketing and sales area have access to the data processed in order to perform their tasks.
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to erasure ('right to be forgotten')</i> - The data subject has the right to request the permanent deletion of his / her data, unless the data processing is based on the performance of a contract, the fulfillment of a legal obligation or a public authority license.</p> <p><i>Withdrawal of consent</i> - The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.</p> <p><i>Right to restriction of processing</i> - If the data subject does not consider the controller authorized, they can request the suspension of data processing during the investigation.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Marketing Satisfaction survey

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
Contact details of data controller:	e-mail	info@dunamedical.com
	telephone	+36 1 790 7070
	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crosssec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crosssec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
E-mail address – to send the survey No personal data is processed when filling in the questionnaire, which is completed anonymously. Data entered into the visitor's book – optionally name, signature	Surveying the opinion of people who use DMC services or their representatives via Google Forms for quality assurance and marketing purposes, in order to improve the services. Sending a thank you e-mail. Storing feedback received in the visitors' book.	Consent of the data subject – GDPR Article 6(1)(a)	Until the consent is withdrawn, but for a maximum of 10 years from the date of the feedback.

Related legislation

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Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

The data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	The staff in the marketing and sales area have access to the data processed in order to perform their tasks.
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to erasure ('right to be forgotten')</i> - The data subject has the right to request the permanent deletion of his / her data, unless the data processing is based on the performance of a contract, the fulfillment of a legal obligation or a public authority license.</p> <p><i>Withdrawal of consent</i> - The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.</p> <p><i>Right to restriction of processing</i> - If the data subject does not consider the controller authorized, they can request the suspension of data processing during the investigation.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform

data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence— according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Marketing Publishing opinions, feedback

Applicable from 1st Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
Contact details of data controller:	e-mail	info@dunamedical.com
	telephone	+36 1 790 7070
	website	www.dunamedicalcenter.org
Name of data protection officer (if available)		Crosssec Solutions Kft.
Contact details of data protection officer (if available)		E-mail: gdpr@crosssec.com Mailing address: 1 Budai Nagy Antal street, attic 319, 7624 Pécs

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Name, photo – optionally, if explicit consent is granted Opinion	For marketing purposes, recording and publishing the opinions expressed by patients or their representatives on websites or social media, in printed marketing materials.	Consent of the data subject – GDPR Article 6(1)(a)	Until the consent is withdrawn, but for a maximum of 10 years from the date of the feedback. In the case of data that has already been published, the data controller can only delete the master copy and cannot be held responsible for any further sharing.

Related legislation

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Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

The data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	LinkedIn Corporation 2029 Stierlin Court Ste 200 Mountain View, California, 94043 United States Social media platform - LinkedIn, Web Hosting Kft. 2 Semmelweis Ignác street 9700 Szombathely, Website storage - Webshark
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission
Meta Platforms (Facebook, Instagram),USA,Privacy Policy Data Privacy Framework, https://hu-hu.facebook.com/privacy/policy https://www.dataprivacyframework.gov/list , parent company access, LinkedIn Corporation ,USA,ÁSZF és Adatkezelési tájékoztató Data Privacy Framework, https://www.linkedin.com/legal/privacy-policy https://www.dataprivacyframework.gov/list , data storage

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
Yes	Meta Platforms (Facebook, Instagram) Meta Platforms Ireland Limited,4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland Social media platform - Facebook, Instagram

Access to data and data security measures:

Restriction of access	The staff in the marketing and sales area, quality management and customer service have access to the data processed in order to perform their tasks.
Data security measures	Physical data security is ensured by a security service, an electronic property protection system, a security camera system, an entry card system and authorization restrictions. The servers are located in a room protected by a fireproof door. Paper documents are stored in locked cabinets and, once archived, in an archive that can be used in a restricted authorization. To ensure electronic data processing, the IT tools used are protected by firewalls, virus protection and password and, where possible, two-factor authentication. Remote access is only possible through a VPN connection. A backup of the data being processed is made. Access to the individual systems and data files requires specific access rights. The controller has an internal information security policy, the content of which is regularly trained to the employees.

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to erasure ('right to be forgotten')</i> - The data subject has the right to request the permanent deletion of his / her data, unless the data processing is based on the performance of a contract, the fulfillment of a legal obligation or a public authority license.</p> <p><i>Withdrawal of consent</i> - The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.</p> <p><i>Right to restriction of processing</i> - If the data subject does not consider the controller authorized, they can request the suspension of data processing during the investigation.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.