PRIVACY POLICY

Camera use
ICU cameras

Applicable from 1 th 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		Crosssec Solutions Kft.
Contact details of data protection officer		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:
Image, behavior Security camera recording and information that can be derived from it	Continuous monitoring of patients in the ICU, immediate identification of emergency interventions when needed.	Legitimate interest – GDPR Article 6(1)(f)	They are for live viewing only, no recording is made.

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)	ComplexIT 45 Jászberényi road 1106 Budapest, Low-voltage systems, Entry control systems, Security camera systems and Access control system support accordance with the contract, running for the nurse call system - Seawing SIS, Hikvision IVMS, Ascom,
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 live images operating in the ICU can only be viewed by the nurses and doctors in the ICU. No recording is made, recordings cannot be played back.
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
Right to information - Data Subject shall have the right to find out the way personal data is handled before data processing begins   *Right to rectification* - 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.   *Right of access* – Data Subject shall have the right to request for personal data stored about him/her from the data controller.   *Right to object* - 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.   *Right to restriction of processing* - If the data subject does not consider the controller authorized, they can request the suspension of data processing during the investigation.   *Right to data portability* - The data subject shall have right to request their personal data stored in digital tabular form.   *Right to review of automated individual decision-making* - 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

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 chioce. 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.