PRIVACY POLICY

Cookie information

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 with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

Data controller

Name of data controller:		Duna Medical Center Kft.
Address of data controller:		5 Lechner Ödön alley 1095 Budapest
	e-mail	info@dunamedical.com
Contact details of data controller:	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

Functional cookies

2/1. Data processed

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

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Cookie identifier IP address	Ensuring the basic functioning of the website	Legitimate interest – GDPR Article 6(1)(f)	Temporary cookies – they remain on the user's device for the duration of the browsing session, after which they are deleted. Permanent cookies – they remain on the user's device until they are manually deleted. (You can find out the exact expiry date of each cookie in the browsing data)

Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	

Does automated decision-making occur during data processing?

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Answer	Short, understandable description of automation
No	

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

Source of processed personal data:

The device used by the data subject

Data will be transmitted to:

	Category	Name of the company, address of	of headquarters, business activity	
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Data processors (performing technical tasks related to data processing)	Komunáldata Kft 17 Rákóczi road 1161 Budapest, Online appointment booking system – MyDMC Medio MedTech Zrt. 2 Lechner Ödön alley 1095 Budapest, Online booking system - Medicall MyMedio Unas Online Kft. 14 Kőszegi road 9400 Sopron, Webshop Web Hosting Kft. 2 Semmelweis Ignác utca 9700 Szombathely, Website hosting - Webshark
Recipients	

Data transmission 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 security measures:

Restriction of access	Only the controller and the relevant staff have access to the data processed for the performance of their tasks. This is ensured by rights management.
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.

Rights of the 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 a legitimate interest or public authority, the data subject may object to the processing of his/her personal data, however objection does not mean the immediate deletion of data.

Right to restriction of processing – Data Subject shall have the right to request for suspension of personal data processing for the period of investigation if he/she does not consider the data controller entitled.

Right to data portability - Data Subject shall have the right to receive the personal data concerning him or her in a structured, digital 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.

Performance and marketing cookies

2/2. Data processed

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

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Cookie identifier IP address	Analysis of visitors' site usage habits and use of this data in advertising and marketing activities	Consent of the data subject – GDPR Article 6(1)(a)	Temporary cookies – they remain on the user's device for the duration of the browsing

	session, after which they are deleted. Permanent cookies – they remain on the user's device until they are manually deleted. (You can find out the exact expiry date of each cookie in the
	browsing data)

Does profiling occur during data processing?

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, A	Answer	Short, understandable description of profiling
No		

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automation
No	

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

Source of processed personal data:

The device used by 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)	Web Hosting Kft. 2 Semmelweis Ignác utca 9700 Szombathely, Website hosting – Webshark Google LLC. Google LLC, San Bruno,94043 USA, California Wesite analytics - Google Analytics
Recipients	

Data transmission 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, Access of parent company,

Google LLC., USA, Privacy Policy and Terms and Conditions

Data Privacy Framework, https://policies.google.com/privacy?hl=hu&fg=1

https://www.dataprivacyframework.gov/list, data storage,

Joint data processing occurs:

Tomit 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 - Facebook, Instagram		

Access to data and security measures:

Restriction of access	Only the controller and the relevant staff have access to the data processed for the performance of their tasks. This is ensured by rights management.
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.

Rights of the 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 erasure ("right to be forgotten") - Data Subject is entitled to request for permanent deletion of his/her data, unless data processing is based on the fullfillment of a contract, fulfillment of a legal obligation or in the exercise of an official authority vested in the controller.

Right to withdrawal of consent - If data processing is based on consent, Data Subject may withdraw consent previously given at any time. Acceptance of withdrawal request may also mean deletion of data but if another legal basis supports data processing, data processing will only end in relation to the specific data processing purpose. Right to restriction of processing – Data Subject shall have the right to request for suspension of personal data processing for the period of investigation if he/she does not consider the data controller entitled.

Right to data portability - Data Subject shall have the right to receive the personal data concerning him or her in a structured, digital 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.

3. Cookies applied

On the website: https://dunamedicalcenter.org

Name of cookie	Type of cookie	Source of cookie	Duration of data processing (expiration date)	Purpose of cookie
XSRF-TOKEN	Functional	dunamedicalcenter.or g	until the end of the session	to screen unauthorized attacks on the website
_fbp	Advertising	Meta (Facebook)	3 months	to track the visits of the user and to display targeted ads
_ga	Analytical	Google Analytics	1 year 1 month 4 days	to distinguish visitors
_ga_7B316RLHTP	Analytical	Google Analytics	1 year 1 month 4 days	to distinguish visitors
_gat_UA-65344728-1	Analytical	Google Analytics	until the end of the session	limitation of data collection
_gat_gtag_UA_ 65344728_1	Analytical	Google Analytics	until the end of the session	limitation of data collection
_gcl_au	Functional	Google Analytics	3 months	to track and store conversions
_gid	Analytical	Google Analytics	1 day	to generate statistical data
cookie_level	Functional	dunamedicalcenter.or g	1 year	
dunamedicalcenter_ session	Functional	dunamedicalcenter.or g	until the end of the session	to ensure fast page loading and easy navigation, to track user activity

On the website:

https://medicall.cc/idopontfoglalas/duna-medical-

center/index?_gl=1*kfn83y*_gcl_au*OTY4MTAwNTI4LjE3MTk5MjcyNTg.*_ga*NjEzODExOTE3LjE2OTkzNzQ3NzM.*_g a_7B316RLHTP*MTcyMDY4ODA4OC41Ni4xLjE3MjA2ODkyNTUuNjAuMC43MDY0Mjc4Njg. website

Name of cookie	Type of cookie	Source of cookie	Duration of data processing	Purpose of cookie
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PHPSESSID	Functional	medicall.cc	until the end of the session	to create a user session, to transfer
			30331011	status data
_fbp	Advertising	Meta (Facebook)	3 months	to track the visits of
				the user and to
				display targeted ads
_ga	Analytical	Google Analytics	1 year 1 month 4 days	to distinguish visitors
_ga_7B316RLHTP	Analytical	Google Analytics	1 year 1 month 4 days	to distinguish visitors
_gat_UA-65344728-1	Analytical	Google Analytics	until the end of the session	limitation of data collection
_gcl_au	Functional	Google Analytics	2 months 20 days	to track and store
				conversions
_gid	Analytical	Google Analytics	1 day	to generate statistical data

On the website:

https://webshop.dunamedicalcenter.org/?_gl=1*16a5n33*_gcl_au*OTY4MTAwNTI4LjE3MTk5MjcyNTg.*_ga*NjEzODEx OTE3LjE2OTkzNzQ3NzM.*_ga_7B316RLHTP*MTcyMDY4ODA4OC41Ni4xLjE3MjA2ODkyNTUuNjAuMC43MDY0Mjc4N

Name of cookie	Type of cookie	Source of cookie	Duration of data processing (expiration date)	Purpose of cookie
UnasID	Functional	.webshop.dunamedic alcenter.org	until the end of the session	to manage the embedded cookie bar
UnasServiceProxyID	Functional	.webshop.dunamedic alcenter.org	until the end of the session	to ensure the functioning of the webshop
_ga	Analytical	Google Analytics	1 year 1 month 4 days	to distinguish visitors
_ga_18B0B04R3E	Analytical	Google Analytics	1 year 1 month 4 days	to distinguish visitors
_gat_gtag_UA_ 65344728_2	Analytical	Google Analytics	until the end of the session	limitation of data collection
_gcl_au	Functional	Google Analytics	3 months	to track and store conversions
_gid	Analytical	Google Analytics	1 day	to generate statistical data

What does "cookie" stand for?

Cookies are small files containing letters and numbers, punctuation and other technical characters that are stored on your device (computer, mobile phone, tablet, smart TV, etc.) when you visit certain websites. These are IT data that help the use of websites, which are sent by the web server to the user's browser, are stored on the user's device, and are returned by the browser to the server with every request directed to it. Cookies do not contain executable files, viruses, spyware programs, and do not access the user's hard drive data.

Cookies usually contain: domain name, what it is valid for, the storage period and the stored value. It enables the recognition of the user's device and browser, thus the appearance of content adapted to the visitor's needs, as well as the basic browsing functions, - e.g. ensuring connected sessions. In addition to the user's anonymity, they cookies support the creation of attendance statistics.

We do not store personally identifiable information in cookies, but in order to improve the user experience, we use encrypted information deriving from them. For example, they help us to identify and resolve errors or to determine the range of interesting, related products that we would like to draw your attention to while browsing our website.

Cookies which are essential for the operation of the website, as well as cookies that support anonymous attendance statistics, are already loaded during the first visit. The user cannot influence this.

Cookies applied to improve the user experience and for marketing activities are only loaded after consent can be given in the cookie notification "box". This consent can be revoked at any time by using the link in the browser or in the footer of the website, or by deleting "cookieconsent status".

If you later contact us via a form - with your express consent - on a website where we use cookies, we may learn the data of your website visits after the form has been blocked with the help of these cookies. This is done to improve the user experience.

If you have accepted the cookie information on our websites, the information will not appear again until you delete the "cookieconsent status" cookie using the link in the browser or the footer of the website.

If you decide to limit, block or delete cookies used by a website, you can do so using your browser. Since every browser is different, you can find information about changing the settings related to cookies in the Help menu of the program you are using (or from the user manual of your mobile phone).

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

The 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)
Seat	9-11 Falk Miksa road, H-1055 Budapest
Postal	Mailbox 9., H-1363 Budapest
address	
Email	ugyfelszolgalat@naih.hu
Phone	+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 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.