

PRIVACY POLICY

Introduction

This Privacy Policy contains the rules for the handling of the necessary personal data. Please do not use this website if you do not agree with these rules.

In accordance with 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 (General Data Protection Regulation, GDPR) and the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as: “Infotv.”)

Data manager

Company name: MEDIHELP Hungary Ltd.

Representative: Zsolt Raveczki

Base of company: 1052 Budapest, Váci utca 12. 2. em 3. Hungary

Postal mailing address: 1052 Budapest, Váci utca 12. 2. em 3. Hungary

Contact telephone number: +36 1 226 1755 (recorded line)

E-mail: office@medihelp.hu

Website operated by the Company: www.medihelp.hu – not adapted for the blind and partially sighted

The company has a data protection officer

Name: Ildikó Mezei

E-mail: adatvedelmitisztviselo@dravanet.hu

The Companies are managing **the personal data described in the sections people concerned in the data protection, aim and length of data protection.**

Our company uses cookies on its website. You should read this policy so you can understand what type of cookies we use, the information we collect using cookies and how that information is used.

During your visit on our website, we will send one or more cookies (small text files) on your device, which individually identify your browser. These cookies are provided by Google and are used through the Google Adwords system. Cookies will be sent to your device only when visiting specific subpages. Hence, we only store the fact and the date of your visit in these cookies, without any further information.

We use these cookies in the following way. External service providers, such as Google, use these cookies for storing the information that the user has already visited the website of the advertiser and display advertisements for the user on the websites of the external service providers, including Google. Users can disable the cookies of Google on the Google webpage for turning off advertisements. (This may also indicate to users that they can disable the cookies of external providers of the unsubscribe website of the Network Advertising Initiative.)

We use the following cookies:

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- cookies for tracking via the website
- login, user identification cookies

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- forbidden the cookies in your browser
- disable the cookies in your browser
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I. The legal basis for data management

When processing personal data, the Company acts in accordance with the provisions of Article 5 of the GDPR regulation. According to them, the processing of personal data is only legal if and to the extent that at least one of the following conditions is met during data processing:

- 1) the data subject has given his consent to the processing of his personal data for one or more specific purposes;
- 2) data processing is necessary for the performance of a contract in which the data subject is one of the parties, or it is necessary for taking steps at the request of the data subject prior to the conclusion of the contract;

3) data management is necessary to fulfill the legal obligation of the data controller. If the data management takes place in the context of the fulfillment of a legal obligation for the data controller, the data management must have a legal basis in Hungarian or EU law or the law of a member state

4) data processing is necessary to protect the vital interests of the data subject or another natural person;

5) data management is in the public interest or is necessary for the execution of a task performed in the context of the exercise of public authority delegated to the data controller;

6) data management is necessary to enforce the legitimate interests of the data controller or a third party, unless the interests or fundamental rights and freedoms of the data subject that require the protection of personal data take precedence over these interests, especially if the data subject is a child.

In the case of entering into a contract, data management is necessary for the fulfillment of the contract or on the basis of legislation. The provision of data is voluntary, the data subject is not obliged to give his consent to the data management, but at the same time he acknowledges that in the absence of providing the data, the Company cannot start or continue the business relationship with him.

In other cases, the provision of data is voluntary, the withdrawal of consent to data management does not affect the legitimacy of previous data management.

II. The range of persons involved, the purpose, legal basis and duration of data management

The management of data involves the data of all **customers, clients, partners, interested persons** (concerned parties). The Company handles personal data (regarding the purposefulness of data collection) exclusively in order to provide the services and payments and other services..

The principles and method of data management

1. The Company will handle all data processing according to the requirements of good faith, fairness and transparency, in collaboration with the involved parties. The Company will only manage the data required by law or supplied by the concerned parties, for the purposes specified below. The scope of the personal data that is processed is proportionate to the objective of the data management and may not exceed its limits.
2. Whenever the Company wishes to use the personal data for other purposes than those for which they were collected, it will inform the concerned parties

about this fact and obtain their prior explicit consent or provide the opportunity for them to prohibit the use of their data.

3. The company does not check the provided data for their adequacy. The person supplying the data is solely responsible for this aspect.
4. For people aged under 16, personal data may only be managed with the consent of the adult exercising parental responsibility. It does not rely in the power of the Company to control the right of the consenting person or the content of his or her statement. Hence, the person concerned or the person exercising parental control over him or her guarantees for the legal compliance of the statement. In lack of this declaration of consent, the Company will process the data of natural persons under 16 exclusively based on legal provisions or if the data management is of general interest or necessary for the completion of tasks assigned to the Company in exercise of public powers, or if the Company has a legitimate interest in the processing of the data.
5. The Company will not transfer the personal data that are handled by it to any third parties outside the data processors specified in the present Privacy Policy and it may only transfer them to the third parties specified as external service providers, in the cases referred to in the present Privacy Policy. The use of data in statistically aggregated form is excepted from the provisions of this paragraph. These data may not contain any element that could serve to individually identify the concerned party, which is, in fact, not considered data management or data transfer.

In some cases, the Company will make available to third parties the available personal data of the concerned person. The cases may include official court and police inquiries, legal proceedings due to copyright, property rights or others infringements, respectively if there are reasonable grounds for the suspicion of such infringement, in cases of prejudice to the legitimate interests of the company, the endangerment of the service's assurance etc.

Data provision involving personal data can only be performed with the consent of the Data Protection Officer. The Data Protection Officer is entitled to disclose personal data based on an official, judicial or NAIH request, only in writing and only if:

- a) the request is received in writing from the authority authorized to request data and is signed, and the original copy is available to the Company; and
- b) in the request, the requesting body indicated the customer, customer group or account about whom the body or authority specified above requests the release of personal data, as well as the type of data requested and the purpose of the data request, unless the authority acting in the scope of its duties (data protection or other supervision) conducts an on-site inspection.

The Company will notify the person concerned about any correction, limitation or deletion of the managed personal data, as well as the parties to who it has forwarded the personal data for purposes of data management. Such notification may be omitted if it does not prejudice the legitimate interests of the person concerned regarding the purpose of the data management.

The Company manages personal data exclusively for specified purposes, in order to exercise certain rights and fulfil specific obligations. The data management process is in accordance with these purposes at each of its stages. The recording and management of the data is done fairly and lawfully. The Company aspires to only handle personal data strictly necessary and suitable for achieving the purpose of the data management. The personal data may only be managed to the extent and for the duration of realizing this purpose.

The Company assumes no responsibility for the legality of the data management of the contractual Partner who is in a legal relationship with the Company and does not perform data processing tasks.

The Company manages the following data:

Type of data	Purpose and reason of data management	Length of data management
natural person policyholder - surname and first name, place and date of birth, mother's name, type and number of ID documents, address, postal address, nationality, sex, telephone number, email address	management of data classified as insurance secrets by the Company as an insurance broker, establishment of a contract, communication	8 years after acceptance of the insurance proposal after termination of the contract (accounting preservation)
Policyholder of the insurance contract legal entity - name of the legal entity, company registration number, tax number, name and position of the representative, legal entity's seat, activity, address of the Hungarian branch, contact person's	management of data classified as insurance secrets by the Company as an insurance broker, establishment of a contract, communication	8 years after acceptance of the insurance proposal after termination of the contract (accounting preservation)

Type of data	Purpose and reason of data management	Length of data management
name, telephone number, email address		
natural person insured - surname and family name, place and date of birth, mother's name, type and number of personal identification documents, address, postal address, nationality, sex, telephone number, email address. In addition, detailed health status information	management of information classified as insurance secrets by the Company as an insurance broker, in particular in connection with the creation and registration of the contract and the service. The purpose of data management is also to maintain the necessary contacts for the amendment of the insurance contract, to maintain the insurance, and for co-insurance, reinsurance	8 years after acceptance of the insurance proposal after termination of the contract (accounting preservation)
insurance contract natural person insured - information provided for the provision of the service, claims: individual's surname and family name, place and date of birth, mother's name, type and number of personal identification documents, address, postal address, nationality, gender, telephone number, email address. In addition, the detailed health information and number of the insurance policy	management of information classified as insurance secrets by the Company as an insurance broker, in particular in connection with the creation and registration of the contract and the service. The purpose of data management is also to maintain the necessary contacts for the amendment of the insurance contract, to maintain the insurance	8 years after acceptance of the insurance proposal after termination of the contract (accounting preservation)

Type of data	Purpose and reason of data management	Length of data management
associated with applying for a particular service		
the name of the individual person requesting telephone information, the number of the policy concerned	provision of information, based on voluntary consent	5 years after the phone call
use of online appointment booking on the Data Controller's website: private person's name, email address, telephone number	reservation an appointment to use the service provided by the Data Controller based on voluntary consent	1 year from the start of the reservation
the name, email address and telephone number of the individual person representing the healthcare provider	making a contract, regular contact	3 months after cancelling the framework contract, cancelling the representation or fulfilling the occasional mandate
the family and first name, telephone number, email address and date of birth of the individual person who asks about something	on the basis of voluntary consent, for the purpose of sale, contract creation, contact	if the interest is not followed by the conclusion of a contract or any registered contact (e.g. newsletter subscription), then 12 months after the sent response e-mail or callback

Type of data	Purpose and reason of data management	Length of data management
name of newsletter subscribers, e-mail, date of subscription	information providing due to voluntary approval, contacting	from subscribing to unsubscribing, or 3 months after sending the last data correction email if the e-mail sent for correcting the data did not receive any active answer
personal information of the users of the company social network page (not closed group) name and public profile picture of the willingly registered on Facebook/Google+/Twitter/Pinterest/Youtube/Instagram/Linkedin etc. social networks	providing information and contacting all the Involved who willingly registered on Facebook/Google+/Twitter/Pinterest/Youtube/Instagram/Linkedin etc. social networks and „liked” the webpage of the Company	the Involved can gain information on the certain social page about the source of data, data management and way of transmitting; the data management is being realized on the social media, so the own regulation of the social page defines the period, way and cancellation and modification of the data
name, address, ID type and number of the person filing liability claim or complaint	due to legal procedure the assessment of the claim/complaint	5 years after posting the answer

Type of data	Purpose and reason of data management	Length of data management
personal information of the accredited: name, address, ID type and number of the person acting instead of and in the name of the Involved	due to voluntary permission the arrangement of the case of the Involved	5 years after closing the case
family name and given name, birth name of private person contract giver / contract acceptor, type and number of document supporting identity, address, mother's name, e-mail address, phone number	making a contract, regular contact	8 years after cancelling the framework contract or fulfilling the occasional mandate (accounting preservation)
private person's details on the invoice / on the acknowledgment receipt required for issuing the invoice (name, address)	based on legislation, to settle the fee for the service used and issue the invoice	for 8 years after the invoice is issued (Accounting preservation)
name of individual person, representing an entrepreneur, e-mail, phone number	making a contract, regular contact	3 months after cancelling the framework contract, cancelling the representation or fulfilling the occasional mandate

Type of data	Purpose and reason of data management	Length of data management
name of individual entrepreneur, base, tax-number, bank account number, email, phone number	making a contract, regular contact	8 years after cancelling the framework contract or fulfilling the occasional mandate (accounting preservation)
data of the individual entrepreneur on the invoice / on the acknowledgment receipt required for issuing the invoice (name, address, tax number, bank account number)	based on legislation, to settle the fee for the service used and issue the invoice	for 8 years after the invoice is issued (Accounting preservation)
personal data (email address, name) provided when using online meeting and discussion platforms (e.g. Teams, Zoom, Webex, Skype)	for all concerned person who voluntarily enter the given online meeting (e.g. webex, zoom, teams, skype, google meet) and join the announced / initiated online meeting for the purpose of negotiation, providing information, and maintaining contact	if no video/audio or video and audio recordings are made, the duration of data management is 1 year from the date of the meeting/initiation of the call, if recordings are made, then 5 years

If the provision of personal data is necessary for the conclusion of a contract, it is a condition for the Company to fulfill the terms of the contract, if they are not provided, the service cannot be used, or in the event of a subsequent request for their deletion, the service cannot be used any further. If the processing of the data subject's personal data is required by a law, the request for their deletion cannot be fulfilled until the legal retention period expires.

Supplying of other data is on a voluntary basis. The withdrawal of consent to the data management does not affect the legitimacy of previous data management.

III. **The persons involved in data processing**

The persons entitled to data management are the employees and representatives of the Company, holding special entitlements.

IV. **Regarding the data transmission and data processing**

The Company is entitled to engage the services of a data processor. The data processors will not take any individual decisions, but are only entitled to proceed on the basis of the contract and of the instructions received from the Company. The Company as data manager will verify the work of the data processors. The data processors are only entitled to employ the services of further data processors with the consent of the data manager.

The Company has a data processor. The data processors of the Company are identified in this Privacy Policy. The data processors employed by the Data Manager are:

The Company uses an accountant as a data processor to perform its accounting duties, not in relation to insurance brokerage but in the general accounting and taxation of the Company:

- Pichler Györgyné, 59528577-1-421148, Bp Kerepesi út 78/B
- GLOBÁL-CONTO '97 KFT, 24664262-2-42, (1144 Budapest, Kőszeg utca 20)

To issue e-invoices, the Company uses software developed by AppSol Zrt. (1122 Budapest, Goldmark Károly utca 35.)

Enterprise Administration is supported by Microsoft Office 365 software. (Microsoft Ireland Operations Limited, Attn: Data Protection Officer, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland.)

Operator of the Company website: ZeroTime Services (2013 Pomáz, Mikszáth Kálmán utca 36/4).. The Company does not store information on the insurance contracts entered into on its website.

The service provider of the online appointment system is: Calendry LLC. 115 E Main St. Ste A1B. Buford GA 30518 USA. The DPO in the area EEA (EU, plus Iceland, Liechtenstein and Norway) is available: DPO Centre Europe, Berlin, Friedrichstrasse 88. Exelent Business Centre Berlin 10117 Germany

The Company transfers data.

Data transfers and their general purpose: management of information classified as insurance secrets by the Company as an insurance broker, in particular in connection with the creation and registration of the contract and the service. The purpose of data management is also to maintain the necessary contacts for the amendment of the insurance contract, to maintain the insurance, and for co-insurance, reinsurance.

Generali Biztosító Zrt. (1066 Budapest, Teréz krt. 42-44.) Document Management Center, Pécs - for data recording and risk assessment, for administration and risk assessment staff; when applying for a service to the Insurer's claims administration and damage assessment staff.

Europ Assistance Magyarország Kft. (headquater 1132 Budapest, Váci út 36-38.) The purpose of data transmission is service organization and claim administration. The recipients of the data are the employees with access rights.

V. The rights of the affected parties regarding the management of their personal data

The right to information: at the request of the affected person, the Company is required to supply information that is easy to find and is of the appropriate size and in a suitable and clear language, about the relevant aspect of the data management (who manages what data, how and from when to when).

The right to access: the private person may request information about whether there is any data management relating to him or her as well as about the data that is managed.

Requesting the correction of data: the affected person may indicate that the data relating to him or her is inaccurate and request the correct data to be indicated. The responsibility for the correctness of the data lies with the data processor. Hence, it is advisable to periodically check the data for accuracy.

The right to deletion: the affected person may at any time ask for the deletion of his or her data. If the affected person has granted access to any third person to the data that is required to be deleted, he or she has to inform about this everyone to whom he or she has disclosed the data, in for all references and stored personal data to be deleted.

The right to the restriction of data processing: in some cases, the person affected by the management of his or her personal data may request the restriction of the management of his or her data, e.g., in situations that are unclear or involve legal disputes or if the data processing is no longer necessary, but the subject would still prefer it to continue.

The right to data portability: the affected person may request access to the data in clearly structured, widely used and device-readable forms (e.g. doc, pdf etc.) and is entitled to forward these data to another data manager without being hindered by the original data manager. In other words, the situation of the person affected by the data management is made easier regarding the transfer of his or her data from one data manager to another.

The right to object: the affected person is entitled to object at anytime to the management of his or her data, for reasons related to his or her specific situation. This is typically the case when the affected person did not give his or her assent to the data management.

The right to the withdrawal of consent: the affected person is entitled to withdraw his or her consent anytime. The withdrawal of consent does not affect the legitimacy of the data management based on consent from before the withdrawal.

The affected person may ask for his or her rights regarding the data to be exercised through addressing a declaration to the data manager, either verbally or in writing, through post, email or the website – preferably through the forum through which the data manager has received the data. In the case of a verbal request, a minute about the request should be recorded and a copy of the minute should be handed over to the concerned person.

If the affected person has any complaints about the data management, we recommend that it be first by the data manager, i.e., the Company. The data manager has 25 calendar days at his disposal to examine and respond to the complaint. If the concerned person upholds the complaint, he or she can turn to the tribunal (the competent court of his or her place of residence) or to the National Data Protection and Information Authority.

The court is acting out of turn in the case. The Data Controller is obliged to prove that the data processing complies with the provisions of the law. In the event that the Data Controller violates the data subject's personal rights by

illegally processing the data subject's data or violating the data security requirements, the Data Controller may claim damages from the Data Controller.

Authority acting in case of violation of rights related to minors, hate speech, exclusionary content, reparation, rights of the deceased, reputation: National Media and Communications Authority (address: 1015 Budapest, Ostrom u. 23-25.; phone: +36-1-457-7100, fax: +36-1-356-5520; Email: info@nmhh.hu)

Contacts for National Data Protection and Information Authority:

mailing address: 1374 Budapest, Pf.: 603.

address: 1055 Budapest, Falk Miksa utca 9-11

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

URL <http://naih.hu>

coordinates: É 47°30'36.8"; K 19°02'54.2"

[Google Maps LINK](#)

This Privacy Statement is a short excerpt of the Data Controller's internal Privacy Policy, which has been created to briefly inform data subjects about certain data management activities of the Data Controller and their relevant rules. This document is governed by the provisions of the Annex to the Regulations and the issues and topics not discussed in the Prospectus, as well as the provisions of the relevant legal regulations, and shall be construed together with them. The full prospectus and the Regulations are available during business hours at the actual place of data management.

The Company draws attention to the fact that this Privacy Policy was prepared based on the specific data management activities of the Data .

This Privacy Policy may be modified by the Company. The current version is always accessible on the Company's website.

Budapest, 20th December 2023

MediHelp International Ltd.