

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 Raveczky

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.**

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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 a contract, data processing is necessary for the performance of the contract or for the issuance of an invoice based on law. Data processing is considered lawful if it is necessary within the framework of a contract concluded with the Company or the intention to conclude a contract with the Company.

In other cases, the provision of data is voluntary, the data subject is not obliged to give his/her consent to data processing, but he/she acknowledges that in the absence of providing the data, the Company cannot initiate or continue the business relationship with him/her. If the provision of the data was voluntary, the withdrawal of the consent given to data processing does not affect the legitimacy of the previous data processing.

The detailed data processing purposes, legal bases and duration of data processing of the Company are contained in the table below.

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 legal basis of data management 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)

Type of data	Purpose and legal basis of data management and reason of data management	Length of data management
<p>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 name, telephone number, email address</p>	<p>management of data classified as insurance secrets by the Company as an insurance broker, establishment of a contract, communication</p>	<p>8 years after acceptance of the insurance proposal after termination of the contract (accounting preservation)</p>
<p>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</p>	<p>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-</p>	<p>8 years after acceptance of the insurance proposal after termination of the contract (accounting preservation)</p>

Type of data	Purpose and legal basis of data management and reason of data management	Length of data management
<p>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 associated with applying for a particular service</p>	<p>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</p>	<p>8 years after acceptance of the insurance proposal after termination of the contract (accounting preservation)</p>
<p>the name of the individual person requesting information, the number of the policy concerned</p>	<p>provision of information, based on voluntary consent</p>	<p>5 years after the email's answer</p>
<p>use of online appointment booking on the Data Controller's website: private person's name, email address, telephone number</p>	<p>based on voluntary consent, reservation an appointment to use the service provided by the Data Controller based on voluntary consent</p>	<p>1 year from the start of the reservation</p>

Type of data	Purpose and legal basis of data management and reason of data management	Length of data management
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	based on voluntary consent, 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
name, email address, phone number of guests participating in the lecture or conference	based on voluntary consent, allowing participation in lectures and conferences, maintaining contact	from the start of the organization of the lecture or conference to 3 months after the event
personal data used for the premium calculation prepared for a person interested in an insurance contract with an insurance broker: name, year of birth, email address, telephone number	based on voluntary consent, 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 wellcome e-mail

Type of data	Purpose and legal basis of data management 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	due to legal procedure the assessment of the claim	5 years after posting the answer

Type of data	Purpose and legal basis of data management and reason of data management	Length of data management
name, address, ID type and number of the person complaint	due to legal procedure the assessment of the complaint	3 years after posting the answer
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
in the case of Financial Arbitration proceedings, the name, address, e-mail address, telephone number of the complainant, the subject and content of the complaint	based on legislation, investigation of consumer complaints, legal remedy	for 3 years from the closure of 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)

Type of data	Purpose and legal basis of data management and reason of data management	Length of data management
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
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)

Type of data	Purpose and legal basis of data management and reason of data management	Length of data management
personal data processed during supplier tendering (name, email address, telephone number, company data of the sole proprietor)	preparation for contract creation, supplier selection	3 months after the tender announcement (invited tender) and the closing of the tender
the family and first name, telephone number, and email address of the individual person in question	based on voluntary consent, sale, contract creation, contact	if the interest is not followed by a purchase / conclusion of a contract or any registered contact (e.g. newsletter subscription), then the sent response email or callback will be sent 12 months after
the family and first name, and email address of the individual person	based on voluntary consent, marketing inquiry	if the inquiry is not followed by a purchase / conclusion of a contract or any registered contact (e.g. newsletter subscription), then 12 months after the inquiry

Type of data	Purpose and legal basis of data management and reason of data management	Length of data management
<p>in the referral process, in a premium-paid insurance contract, the natural policyholder person to the insurance contract, as the referrer – last name and first name, telephone number, email address. In the event of a successful referral, the serial number of the voucher offered by the data controller</p>	<p>based on voluntary consent, through own customer satisfaction, recommending the data controller's services to third party natural persons</p>	<p>12 months from the date of the referral of the recommended person by the referrer. In the event of a successful referral, an additional 12 months from the conclusion of the contract until the referrer becomes entitled to receive the gift offered by the data controller.</p>
<p>in the recommendation process, a natural person as a person recommended for concluding an insurance contract – last name and first name, telephone number, email address, date of birth</p>	<p>acceptance of the recommendation and preparation for concluding an insurance contract based on voluntary consent</p>	<p>if the acceptance of the recommendation is not followed by the conclusion of an insurance contract, then 12 months after the acceptance of the recommendation</p>

Type of data	Purpose and legal basis of data management and reason of data management	Length of data management
personal data (email address, name) provided when using online meeting and discussion platforms (e.g. Teams, Zoom, Webex)	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
free VoIP services for smartphones (teams chat), which allows the user to make phone calls, send messages and video chat via an Internet connection. The program forms the contacts within the given service from the user's contact list (name, email address, photo)	provision of information and contact for all stakeholders who have a company smartphone based on their employment contract (name and phone number)	1 year from the beginning of the business relationship to the end of the relationship
use of online appointment booking on the Data Controller's website: name, email address, telephone number of the individual	booking an appointment to use the service provided by the Data Controller based on voluntary consent	1 year from the start of the reservation

Type of data	Purpose and legal basis of data management and reason of data management	Length of data management
recorded telephone calls (incoming and outgoing on landlines): personal data provided by the caller and his/her voice	based on voluntary consent, quality assurance, handling of complaints	max. from the call 60 days, in case of a compliant, 5 years
Personal data of employees transmitted to the data controller by clients and partners contracted with the data controller for the purpose of conducting business activities and fulfilling contracts with clients and partners: employee name, email address, landline phone number and company mobile phone number	performing the tasks undertaken in the business contract, avoiding legal disputes	until the termination of the right of the data subject to contract or contact
name, email address, phone number of guests participating in the lecture or conference	based on voluntary consent, allowing participation in lectures and conferences, maintaining contact	from the start of the organization of the lecture or conference to 3 months after the event
press representatives - name, telephone number, e-mail address	based on voluntary consent, contact	1 year from the end of the professional relationship

Type of data	Purpose and legal basis of data management and reason of data management	Length of data management
the name of the inspector specified in the mandate letter for the official inspection, and if applicable, the employer's ID number	identification of the official inspector based on legislation	10 years after the issuance of the decision concluding the official inspection
name, email address and, if applicable, employer ID number of the auditor specified in the mandate letter for the group-level or ownership audit	identification of the internal auditor, compliance officer based on ownership interest based on employment or agency contract	10 years after the issuance of the final inspection report

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 sends out newsletters using Mailchimp. MailChimp (Ponce City Market, Atlanta, Georgia, USA) Név: The Rocket Science Group LLC d/b/a (MailChimp); Székhely: 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA.

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. (headquarter 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.

In the event of a financial conciliation procedure, if necessary, the complainant's personal data will be forwarded to the Financial Arbitrage Board.

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

Before fulfilling the request of the data subject, the identity of the data subject must be identified in all cases. If the Company cannot identify the data subject, it cannot fulfill the request. After identification, the Company will provide information about the request in writing, electronically, or verbally at the request of the data subject. If the data subject submitted the request electronically, the Company will also respond electronically. Of course, in this case, the data subject also has the opportunity to request another method. The requested information and action are free of charge. An exception is the case if the request is clearly unfounded or - especially due to its repetitive nature - excessive. In this case, the Company may charge a fee or refuse to fulfill the request.

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 data subject has the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him or her, in accordance with Article 21 of Regulation (EU) 2016/679 of the European Parliament and of the Council.

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 30 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)

Contact details of the National Data Protection and Freedom of Information Authority

Mailing address: 1363 Budapest, Pf.: 9.

Address: 1055 Budapest, Falk Miksa utca 9-11

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu or privacy@naih.hu

URL <http://naih.hu>

VI. Data management security measures

The Contractor shall take advanced technical and organizational protection measures of the standard expected for the size and activity of the enterprise, which ensures the security of the management and processing of personal data in the prescribed manner.

The data controller ensures the security of the data. To this end, it takes the technical and organizational measures and develops the procedural rules that are necessary to enforce the governing legislation, data and confidentiality rules.

The data manager uses appropriate measures to protect the data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction and damage, as well as against becoming inaccessible due to changes in the technology used.

When defining and applying measures for data security, the data controller takes into account the state of the art at all times and chooses among several possible

data management solutions the one that ensures a higher level of protection of personal data, unless it would represent a disproportionate difficulty.

This Data Protection Notice is a short extract of the Data Controller's internal Data Protection Policy, which was created with the aim of concisely informing those concerned about some data management activities and relevant rules of the Data Controller. This document is governed by the Regulations and the provisions of the relevant legislation with respect to the Annex to the Regulations and issues and topics not discussed in the Information Sheet, and must be interpreted together with them. The Information and Regulations are available in their entirety during working hours at the actual place of data processing.

The Data Controller draws attention to the fact that this Notice was prepared based on the specific data management activities of the Data Controller.

This Information Sheet may be modified by the Company, the current information is available on the Company's website.

Budapest, 14th April 2026

MediHelp International Ltd.