INFORMATION NOTICE
ON THE PROCESSING OF PERSONAL DATA BY MEDSANA BUCHAREST MEDICAL CENTRE S.R.L.

In accordance with the provisions of the General Data Protection Regulation[1] (hereinafter also referred to as "**GDPR**"), enforceable since 25 May 2018, **MEDSANA BUCHAREST MEDICAL CENTRE S.R.L.** ("**Medsana Medical Centre**", "**Medsana**" or "**the Company**") has the obligation to process personal data (as defined by the legislation in force) in a safe manner, and for the general purposes specified in this Information Notice, in the context of providing the medical services offered to you in the Medsana clinics.

1 GENERAL INFORMATION

Through this Information Notice we wish to explain the way in which your Personal Data (specified in this Information Notice) is processed by Medsana Medical Centre and how we ensure that your Personal Data is processed responsibly and in compliance with the applicable data privacy legislation.

Personal Data (consisting of any information that may lead to the identification of a natural person) is detailed in section 5 below, and it is defined in consideration of the applicable legal provisions.

For the purpose of this Information Notice, we hereby notify you that Medsana Medical Centre is a Personal Data Controller, as defined by the GDPR.

Our intention is to provide you with sufficient information, presented in an easily comprehensible, to ensure that you understand the processing activities performed by Medsana within the relevant legal context.

For any enquiries that you may wish to make with a view to gaining a better understanding of this Information Notice or of the processing activities carried out on your Personal Data, please do not hesitate to contact us using the contact details provided at the end of this Information Notice.

2 IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

Name	**MEDSANA BUCHAREST MEDICAL CENTRE S.R.L.**
Headquarters	Str. Dr. Nanu Muscel nr. 12, sector 5, C.P. 050521, Bucuresti
Fiscal Code (C.U.I.)	10019809
Trade Registry reg. no.	J1997009685402
Share Capital	1.703.820 lei
Telephone	021-408 78 00, 021-9607
Fax	021-402 8077
E-mail address	office@medsana.ro

3 CONTACT DETAILS OF THE DATA PROTECTION OFFICE (DPO)

Please find the contact details of the Medsana Data Protection Officer (also referred to as "**DPO[2]**") below, whom you may contact regarding any matter relating to the protection of your Personal Data:

Telephone	021-408 78 00
Fax	021-402 80 77
E-mail address	dpo@medsana.ro

[1] Regulation (EU) 2016/679 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.
[2] DPO represents the acronym for "*Data Protection Officer"*.

4 PURPOSES FOR WHICH YOUR PERSONAL DATA IS PROCESSED. RELEVANT LEGAL GROUND

The processing and storage of personal data is done in optimal security conditions and for legitimate purposes related mainly to the provision of medical services or occupational health services and, secondarily, for advertising, marketing (Newsletter), statistics, accessing promotional campaigns or programs of medical services. Each time we request the collection, subsequent processing, and possibly the transfer of personal data, the use shall be made only for the mentioned purpose, and in case of use for other purposes you shall be asked to consent.

Data sources can be multiple: data obtained directly from the patient, obtained from their employer - when they conclude a contract for the provision of medical services (occupational medicine, preventive care and ambulatory care), obtained from the insurer with which the patient has concluded a health insurance policy etc.

Your Personal Data indicated in section 5 below shall be processed in compliance with the legal grounds herein below for the following purposes:

(1) **Purpose – Provision of health services:** Provision of medical services requested by you, provision of occupational health services, medical diagnosis, provision of medical or social assistance or of medical treatment, or management of health and social assistance systems and services, provision of emergency medical services (ambulance), provision of medical services for migrants, supplying of medical services through specific on-line platforms based on your consent for their use, recording of medical services provided, communicating with you about the medical services provided, informing you of the medical services provided, option to access your health medical folder using the software application (dedicated platform) of Medsana, activation and / or adjustment of your subscription to our medical services, appointments, identifying you and the services you have accessed, including the **relative financial records**: releasing the financial and accounting documents to you (for example, bills or invoices), the collection of payments for the services you benefit from, the reimbursement of money to you, the transmission of notifications relating to the financial status / status of payments etc.
Legal ground: your request, before concluding a contract or in order to execute an order / a contract concluded by Medsana with you (having the services provided by Medsana as object)

(2) **Purpose – Management of the agreements concluded with the services providers** in order to perform the healthcare services through partners or collaborators

Legal ground: your request, before concluding a contract or in order to execute an order / a contract concluded by Medsana with you (having the services provided by Medsana as object) as well as the services agreement concluded between provider and Medsana

(3) **Purpose – Marketing:** Regular briefings of medical nature or referring to Medsana services, promotions etc. (the Newsletter).

Legal ground: your consent (this agreement is granted either by filling out a form in one of the Medsana clinics, which can be performed either upon initial registration in the database or subsequently – upon accessing programs of medical services; via the forms on the website; upon participation to events etc.)

(4) **Purpose – Medical statistics:** Processing for this purpose shall be performed only upon written request from state institutions with attributions in the field of statistics.

Legal ground: public interest confirmed by the public institutions in charge.

(5) **Purpose – Improvement of services:** Identification of suggestions or possible relevant information concerning existing services for the purpose of improving them, implementation of new services or improvements to existing ones.

Legal ground: your consent expressed prior to submitting the form on the website [https://www.medsana.ro/informatii-pacienti/parerea-dumneavoastra]

(6) **Purpose – Video Surveillance:** Medsana Medical Centre processes Personal Data by means of video surveillance, the processing aims to ensure the prevention of criminality and protection of private property, without prejudice to the rights and fundamental freedoms or to your interest.

Legal ground: the recommendations provided in the Physical Security Risk Analysis carried out by Medsana on the basis of Law no. 333/2003 regarding the protection of objectives, assets, values and the protection of person

(7) **Purpose – Management of phone calls through the Call-centre** on purpose of support services for appointments, requests, intimation, information etc.

Legal ground: consent prior expressed by the caller

(8) **Purpose – Management of complaints and litigation**: solving intimations / complaints formulated by you in the event of the occurrence of disputes in connection with services rendered to you and / or relating to the relationship between you and Medsana; the recovery of debts from you (which may require the involvement of third parties)
Legal ground: legitimate interest regarding solving intimations / complaints formulated by you in the event of the occurrence of disputes in connection with services rendered to you and / or relating to the relationship between you and Medsana

(9) **Purpose – Management of internal and external audit activity:** carrying out internal and external audit activities to verify the operational activities (inclusively of the accredited management systems).

Legal ground: legitimate interest in ensuring the operational compliance of the activity

5 PERSONAL DATA CATEGORIES. CONSEQUENCES OF REFUSAL TO PROVIDE PERSONAL DATA

Personal Data concerning you (referred to in this Information Notice as "**Personal Data**") and which shall be processed by Medsana is (i) data obtained from the potential or current employer (especially in the context of services related to occupational medicine), (ii) data obtained directly from you, in the context of services provided or (iii) data / results obtained as a result of the provision of services offered by Medsana Medical Centre.

The personal data you provide during the telephone call scheduling an appointment, by e-mail or inside the clinics (surname, first name, telephone, e-mail, date of birth, symptoms, data on tests and performed or requested investigations, Personal Identification Number – CNP etc.) is registered and processed by Medsana Medical Centre only insofar as this information has been provided by you without any constraint and with prior information.

In Medsana Medical Centre, by scanning the identity document, the following personal data is selectively collected:

(i) *full name and surname*: for the purpose of identifying the patient, performing the healthcare service and, at the patient's request, issuing the invoice for the provided services;
(ii) *gender and date of birth*, which are extracted from the CNP: for the purpose of identifying the patient and running the healthcare service;
(iii) *CNP*: for the purpose of identifying the patient and running the healthcare service;
(iv) *domicile address*: for the purpose of running the healthcare service; for the purpose of issuing, at the request of the patient, the invoice for the rendered healthcare services

By scanning, no personal data other than those listed above is extracted. If you do not wish the collection by scanning, the collection and entry of the personal data listed above into our electronic record system will be done manually based on the identity document offered by you. For transparency and good understanding, please be informed that we have opted to use the scanning process in order to avoid human registration errors.

Medsana Medical Centre shall not be held liable for inaccurate, incorrect information / data / documents which you provide to us. You have the obligation to inform us of any changes that occur to your Personal Data so that they are permanently accurate and up to date. Should Medsana Medical Centre have suspicions regarding the authenticity of documents or information provided, it shall be entitled to notify the public authorities / institutions authorized to investigate, supervise and control.

Personal Data includes the following categories of data:

(1) **Contact details**, such as: surname and first name, domicile / residence address, telephone number (landline and / or mobile) and / or fax, e-mail address, correspondence address;
(2) **Personal data**, such as: date of birth; sex; age; information about tobacco, alcohol, caffeine or drugs consumption; information about your environment and lifestyle; the series and number of your identity document; your personal identification number (CNP); other information included in the identity card; video images (obtained based on video recordings made in Medsana spaces, where video surveillance cameras are mounted); voice (based on records of calls made through the Medsana Medical Centre Call Centre); signature;
(3) **Medical data** (which is included in special personal data categories), such as: data on health related to the medical services provided (such as: medical services that you access in Medsana clinics, diagnosis, test results that we perform for you or that you make available to us, the treatment that we prescribe or administer to you, the doctor that examines or has examined you, the referring doctor, medical recommendations, symptoms, medical history, previous illnesses, blood type; information you provide to us about your family members, if applicable); physical characteristics (various ailments); genetic data; biometric data; biological samples; as regards dental services: dental impression, dental technical work related to the dental impression; imaging, as well as any other medical information that you provide to us or that results from the services provided by Medsana;
(4) **Access data for obtaining the result bulletin in the Web Results platform**: sample code and web code; QR code;

(5) **Data regarding ethnicity** (which is included in special personal data categories) that is processed during the provision of medical services, such as prenatal testing, screening / diagnosis;
(6) **Data concerning your sex life** (which is included in special personal data categories) that is processed during the provision of medical services;
(7) **Data regarding your professional situation**, such as: your future employer or current employer; your occupation / position; other details submitted by the prospective employer / current employer about your employment relationship;
(8) **Data regarding your insurance status**, such as: your insured / uninsured status; the insurer; the insurance policy number;
(9) **Payment data**, such as: invoice details; bank account number; bank card details (card number / IBAN code, date of issuance, expiration date); amounts paid and / or payable; payment status;
(10) **Data regarding your relationship with Medsana**, such as: history of your relationship with Medsana; any suggestions or opinions that you may send, either directly or through other communication means (which may include social networking and other public communication means).

We wish to emphasize that, in principle, you have no obligation to provide us with your Personal Data indicated in this Information Notice. However, to the extent that you do not provide us with the Personal Data described herein, we shall not be able to provide the medical services required and / or you shall not be able to benefit from all the facilities that Medsana offers (for example: by not informing us of your telephone number / e-mail address we shall not be able to communicate with you regarding confirmation / possible changes in appointments or to send you results of medical services provided. In this situation communication or delivery of results shall be done at the receptions of the Medsana clinics).

In the event that, in the context of services that Medsana provides to you, you provide us with personal data about other persons besides yourself (such as: possible conditions that are recurrent in your family), please be advised that we shall treat this information as confidential and shall use it only for the purpose of providing medical services to you. At the same time, we wish to emphasize that we shall take all necessary measures to ensure the adequate protection of this data, given the obligation of maintaining professional / medical secrecy incumbent on Medsana.

6 RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

In principle, your Personal Data shall be processed by Medsana. However, considering both the complexity of the services provided to you by Medsana, its affiliation to a group of companies providing medical services similar or complementary to those provided by Medsana Medical Centre, as well as the Medsana's need to work with certain external partners offering support, we would like to inform you that your Personal Data may be transferred to other individuals or legal entities, to be processed for the purposes detailed in this Information Notice.

Taking into account the context of the relations established by Medsana with its partners (either part of the group or outside the group), as well as the possibility of occurrence of various changes regarding these relations, it is not feasible to identify all these partners, and they shall be mentioned generically, depending on the established / potential relationship with Medsana.

In this sense, your Personal Data may be transferred to:

(1) **Collaborating doctors and accredited medical service providers**
Medical services can also be provided by accredited medical service providers (including emergency medical service providers – ambulance) – collaborating doctors and partner clinics of Medsana – within the country or abroad.

In this regard, we would like to inform you that the data / information about your health, dental impression or biological samples, regardless of their content or volume, may be communicated to accredited health care providers in the country or in other states (whether that state is a Member of the European Union or not), in compliance with the applicable legal provisions.

Medsana makes every effort to ensure that collaborating physicians and other accredited health care providers comply with the provisions of personal data protection legislation. Prior to performing the medical service, where required by law, you shall receive the form "Informed Patient Consent" which shall provide you with data and information on the partner of Medsana and the context of their processing of your Personal Data.

(2) **The situation of judicial, investigation, supervision and control institutions and / or authorities**

To the extent that, in accordance with the legal provisions in force, personal data / information is requested from Medsana Medical Centre by various official bodies and / or institutions (for example: criminal investigation bodies, the police, financial, fiscal, social security control bodies and institutions, courts, Casa Națională a Asigurărilor de Sănătate – the National Health Insurance Authority, Casa de Asigurări de Sănătate a Municipiului București – the Bucharest Health Insurance Authority, and any other supervisory and control institutions and / or authorities), Medsana has the obligation to provide the requested data / information, without asking for your prior consent, and even if you object or do not express your point of view.

In addition, it is possible that, in certain situations, such data / information shall have to be made available without the prior request of these institutions, bodies and / or authorities, situations in which Medsana shall transfer the necessary data / information, in compliance with legal requirements.

(3) **Other companies in the Medsana group**

In the context of Medsana's activity, Personal Data may also be transferred to various entities in the group to which Medsana is affiliated, whether they are from Romania or from abroad (such as: entities from Greece).

(4) **Insurers, other partners**

- Entities from Romania or from other states, in the context of the medical services you have enjoyed from Medsana and / or from its partners (where applicable).
- Domestic and international institutions authorized to carry out migration services.

(5) **Your employer**

In the context of services related to occupational medicine, and without disclosing other information than that necessary according to the applicable legal provisions (for the avoidance of any doubt, no results of / data related to medical investigations shall be transferred).

(6) **Other recipients**

Medsana may also disclose your Personal Data to other third parties, such as: providers of platforms for medical and ERP-type services, IT support service providers or technical and organizational service providers related to medical equipment maintenance activities, marketing applications / platforms and services providers, payment services, archiving services, legal consultants, auditors, financial

and accounting consultants or other consultants of the Company and / or of some entities within the Medsana group, in connection with extraordinary business operations (for example, in case of mergers, acquisitions and similar), with which the Company and / or the respective Medsana group entity shall conclude confidentiality agreements, accordingly (insofar as certain legal and / or statutory confidentiality requirements / guarantees shall not be applicable regarding these).

Additionally, your Personal Data may also be transferred to other individuals or legal entities in Romania or abroad in the context necessary to establish, exercise and / or defend a right of Medsana or another entity within the Medsana group in court.

We wish to assure you that the Company shall exercise adequate diligence in selecting its third party service providers and / or partners and shall request that these providers / partners maintain the appropriate technical and organizational security measures to protect the Personal Data they have access to and to process them in accordance with the applicable legal provisions.

In the situation where the operations of processing Personal Data shall be performed by Medsana through persons authorized by it, Medsana shall ensure compliance with the specific requirements imposed by the provisions of Article 28 of the GDPR, ensuring, inter alia, that (i) the respective Personal Data processing operations are performed under a contract addressing issues specific to the operator-proxy relationship in compliance with the GDPR and (ii) the proxy shall perform the processing of Personal Data based on Medsana instructions.

7 TRANSFER TO THIRD COUNTRIES

In the situation when your Personal Data shall be transferred to entities outside the European Union and / or the European Economic Area, for the purpose of specific analyses requested in the context of the services provided by Medsana, we shall ensure that adequate safeguards are applicable to allow the transfer in accordance with the requirements of personal data protection legislation (safeguards which may include: the application of standard contractual data protection clauses or the existence of a European Commission decision adopted in this regard).

8 PERIOD FOR WHICH PERSONAL DATA SHALL BE STORED

We intend to keep your Personal Data accurate and up to date. We also strive to keep your Personal Data no longer than is necessary to fulfil the purposes listed in this Information Notice or for the duration provided by applicable law.

In this regard, we hereby inform you that we shall store your Personal Data for the entire period of the relationship established with you, but also subsequently, for a certain period of time, in consideration of the applicable legal provisions. Thus, the Personal Data shall be kept for (i) a period between 1 to 30 years (the extended retention period being applicable, in principle, to medical documents that shall have to be archived for such periods) and for (ii) duration of the IT medical system for the bulletins of results for the laboratory tests, in compliance with the legislation in the field, in conditions of maximum security.

To the extent that certain Personal Data is included in or related to certain accounting documents of the Company, for which a specific retention period shall have to be observed (for example 5 or 10 years), that Personal Data shall be kept for those applicable periods.

As regards the images obtained by video surveillance, they shall be stored for a maximum of 30 calendar days from the date of recording, unless a longer period is allowed or required by applicable law.

Calls made through the Medsana Medical Centre telephone exchange are registered and stored for a period of 45 days from the date of registration, except for cases when a longer duration is allowed or imposed according to the applicable legislation.

9 YOUR RIGHTS AS REGARDS PERSONAL DATA

In accordance with the applicable provisions regarding personal data, we hereby inform you that you have the following main rights:

(1) **The right of access** to the Personal Data processed, meaning your right to obtain from the Company a confirmation whether personal data concerning you is processed or not and, if so, access to that data and the conditions in which it is processed (including the purpose of the processing, the categories of data processed, the recipients of the data).
(2) **The right to rectification** of Personal Data, meaning your right to request the rectification of inaccurate Personal Data, data which is no longer up to date or the completion of incomplete data.
(3) **The right to erasure** of your Personal Data that may be exercised in certain circumstances provided by applicable law, including: the situation where the Personal Data is no longer necessary in connection with the purposes of processing; the situation where the data subject opposes the processing and there are no other legitimate interests that prevail for the processing; the situation where the Personal Data has been processed illegally.
(4) **The right to restriction of processing**, meaning your right to obtain from the Company restriction of processing in the following cases: (i) you contest the accuracy of the data (the restriction shall last as long as it is necessary for the Company to verify the accuracy of the personal data); (ii) the processing is unlawful and you object to the erasure of the data by requesting the restriction of their use instead; (iii) the Company no longer needs the Personal Data for the purposes mentioned above, but you require the Personal Data for the ascertainment, exercise or defence of a right in court; or (iv) you objected to the processing, for the period during which the Company verifies whether the legitimate rights of the Company prevail over your rights.
(5) **The right to object to the processing,** meaning your right to object to the processing for reasons related to the particular situation you are in, when the processing (i) is based on the legitimate interests of the Company or a third party, including in the case of profiling based on this basis or (ii) to the extent applicable, is performed for the purpose of direct marketing communications, involving the creation of profiles.
(6) **The right not to be subject to an automated decision,** which means that, as a user of our services, you shall not be subject to a decision of ours based exclusively on the automated processing of your data (including the creation of profiles) which produces legal effects concerning you or affects you in a similar way to a significant extent.
(7) **The right to data portability,** meaning your right to request that your Personal Data existing in the Company's database be moved, copied or transferred to another database, in a structured, commonly used and machine-readable format, provided that the processing is based on consent or a contract and is performed by automated means.
(8) **The right to file a complaint** before the National Supervisory Authority for the Processing of Personal Data and to address the competent courts.

(9) **If the legal ground used is your consent, it can be withdrawn at any time by you** using the communication channels mentioned below. In the case of the Newsletter, in addition to the communication channels mentioned below, the withdrawal of consent can also be done by pressing the "Unsubscribe" button in the footer of any e-mail you receive from Medsana or by contacting us at the e-mail address newsletter@medsana.ro. Withdrawal of consent may lead to the impossibility of running the initially accepted services.

At any time you may exert the rights mentioned under (1) - (7) above, by written and signed request, registered with Medsana, using any of following communication channels (Attn: Data Protection Officer):

(i) e-mail address dpo@medsana.ro or
(ii) at the Medsana Clinic's offices or
(iii) by mail to the address Medsana Bucharest Medical Center S.R.L., Bucharest, 5th district, ZIP 050521, 12 Dr. Nanu Muscel street.

In your request, you can mention whether you want the information to be communicated to you at a certain address (which may also be an electronic mail address) or through a correspondence service to ensure that the delivery is done personally.

The information requested shall be communicated within 1 (one) month from the date of receipt of the request, observing your communication options. If it is not possible to comply with the aforementioned deadline, you shall be informed of the reason for delaying the answer, at the same time notifying you of the procedure envisaged for solving your request, as well as the estimated time limit.

10 THE NON-EXISTENCE OF AN AUTOMATIC DECISION-MAKING PROCESS

Taking into account the specific relationship between Medsana and you, we hereby inform you that you shall not be the subject of a decision based solely on automated processing, including profiling, which produces legal effects that concern you or affect you similarly to a significant extent.

11 CHANGES TO THE INFORMATION NOTICE

Should we substantially change our Personal Data processing practices or this Information Notice, we shall issue a revised Information Notice and / or take other steps to notify you of such changes, in accordance with the applicable legislation.

I hereby acknowledge the contents herein:

Data Subject: **NAME AND SURNAME:**

Date: **DD_____MM_____YYYY_____**

Signature of Data Subject:

YOUR CONSENT TO
DATA PROCESSING FOR MARKETING PURPOSES

Please check, depending on your preferences.

☐ I agree to the use of my contact details

☐e-mail

for marketing and advertising purposes from Medsana (transmission of Newsletter).

☐ I do not agree with the use of my contact details for marketing and advertising purposes from Medsana (transmission of Newsletter).

Insofar as you have checked that you agree, you can withdraw from this agreement at any time by clicking on the "Unsubscribe" link at the bottom of any email you receive from us or by contacting us at the email address newsletter@medsana.ro or dpo@medsana.ro.

Data Subject: **NAME AND SURNAME:**

Date: **DD_____ MM_____YYYY_____**

Signature of Data Subject: