

PRIVACY POLICY

GDPR 12/11/2019

www.surgossegikartya.hu
www.orvosikartya.hu

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www.surgossegekartya.hu

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INTRODUCTION

The **Innova Medicina Korlátolt Felelősségű Társaság**

tax number: 27100378-2-42

seat: 1146 Budapest, Thököly út 81., Hungary

as **data controller**

- *hereinafter referred to as* "**Data Controller**" – a company engaged in the healing, medical and health sciences and medical services.

The Data Controller acknowledges the content of this Privacy Statement as binding on itself. It undertakes itself to all data processing activities related to its activities comply with the requirements set out in this privacy policy and the applicable national and European Union laws and legal acts. The Privacy Policy guidelines related to the data processing of Innova Medicina Kft. are available on <https://www.surgossegekartya.hu>, <https://www.orvosikartya.hu> websites (hereinafter referred to as "websites").

The Data Controller reserves the right to change this Privacy Policy if it does not affect the scope of the data processed, the legal basis, purpose and duration of the data processing.

The Data Controller hereby informs you that the services available on the designated websites do not constitute health services.

This Privacy Policy has been prepared in accordance with the General Data Protection Regulation 2016/679 / EU (hereinafter referred to as the "Regulation").

Data of Data Controller:

Company name: **Innova Medicina Korlátolt Felelősségű Társaság**

Seat: 1146 Budapest, Thököly út 81.

Tax number: 27100378-2-42

Represented by: Dr. Tímea Tács

E-mail: adatkezeles@surgossegekartya.hu

www.surgossegekartya.hu

www.orvosikartya.hu

Contact: László Olasz

Telephone: +36 30 677 1972

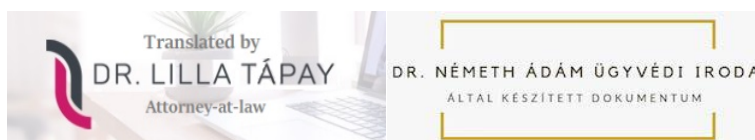
E-mail: adatkezeles@surgossegekartya.hu

Data Protection Officer:

Name: Dr. Ádám Németh attorney-at-law

Web: <http://www.drnemethadam.hu/>

E-mail: bejelentes@drnemethadam.hu



Presentation of the scope of data processing

Registration on websites

Content of data processing, scope of processed data

Websites provide an emergency support service abroad that requires registration. Thus, the registration is a prerequisite for accessing the websites and the service.

Scope of processed data:

- e-mail address
- password

Purpose of data processing

The purpose of data processing is to create a registration.

Legal basis for data processing

The data processing is based on your explicit consent pursuant to Article 6 (1) (a) of the Regulation.

Duration of data processing

Data Controller process the data for the duration of the registration, which may be terminated in the following cases:

- the Data Controller or you terminate the contract to use the service,
- you explicitly request to cancel your registration,
- the registration shall be cancelled by the Data Controller after the failure to pay the fee.

If you do not order the service within 15 days of your registration, your Client Account and with this the data processing will be automatically terminated.

The deadline for deleting the data is 15 days from the event that caused it.

Third parties accessing data

From the registration information, your name may be known to a third party if your Emergency Medical ID Card is used to access the service.

Entering account information

Content of data processing, scope of processed data

Websites provide an emergency support service abroad that requires registration and payment of a fee. You shall enter the following account information to purchase the services.

Scope of processed data:

- full name
- e-mail address
- phone number
- avatar (photo).

Purpose of data processing

The purpose of data processing is to identify you and to create a user profile, which is a mandatory step in your order.

Legal basis for data processing

The data processing is based on your explicit consent pursuant to Article 6 (1) (a) of the Regulation.

Duration of data processing

Data Controller process the data for the duration of the registration, which may be terminated in the following cases:

- the Data Controller or you terminate the contract to use the service,
- you explicitly request to cancel your registration,
- the registration shall be cancelled by the Data Controller after the failure to pay the fee.

If you do not order the service within 8 days of your registration, your Client Account and with this the data processing will be automatically terminated.

The deadline for deleting the data is 15 days from the event that caused it.

Third parties accessing data

Your name may be known to the health care provider who carries out your care abroad, if you hand over the card to the care provider or otherwise it takes possession of the card.

These persons may also be third-country providers where the appropriate level of data protection is not available, so please note when ordering this service that the Service Provider cannot guarantee that the healthcare provider will handle the data in accordance with the Regulation.

Upload health history data and emergency care

Content of data processing, scope of processed data

A central feature of the services available on websites is that medical history data can be uploaded to the websites in order to if you need healthcare abroad the care provider can use your data to provide you with more accurate healthcare.

Uploading medical history data is optional and you can choose which data to upload.

However, by possessing the emergency card the person who uses the emergency card will be able to know the uploaded data.

The scope of the collected health data can be accessed accurately on the website, and the scope of the data has been determined with the assistance of a health care professional.

Purpose of data processing

Providing the service to you.

Legal basis for data processing

The processing of data is based on the one hand is the fulfilment of the contract with you as the subscriber to the service on the websites under Article 6 (1) (b) of the Regulation. On the other hand, since sensitive data is being processed the processing of data is based on Article 9 (1) (a) of the Regulation is your explicit consent.

Duration of data processing

The data are processed during the use of the service, so if you request the deletion of your data or the service contract, between the Data Controller and you, terminates the data will also be deleted.

Third parties accessing data

Your data may be known to the health care provider who carries out your care abroad, if you hand over the card to the care provider or otherwise it takes possession of the card.

These persons may also be third-country providers where the appropriate level of data protection is not available, so please note when ordering this service that the Service Provider cannot guarantee that the healthcare provider will handle the data in accordance with the Regulation.

Production and delivery of an emergency card

Content of data processing, scope of processed data

The service is available via the emergency card abroad, and using the card, healthcare providers can access data via the Internet.

The emergency card shall contain:

- your name,
- unique card identification number,
- card PIN code.

The card production is a central feature of the service, without this the service cannot be used.

Your name and shipping address shall be processed by the Data Controller in order to deliver the Card.

Purpose of data processing

Providing the service to you.

Legal basis for data processing

Data processing is based on the performance of a contract with you, as the subscriber to the service, on the websites under Article 6 (1) (b) of the Regulation.

Duration of data processing

The data are processed during the use of the service, so if you request the deletion of your data or the service contract, between the Data Controller and you, terminates the data will also be deleted. Nevertheless, the card will remain in your possession, but no health data will be available through it.

Third parties accessing data

Your data may be known to the health care provider who carries out your care abroad, if you hand over the card to the care provider or otherwise it takes possession of the card.

These persons may also be third-country providers where the appropriate level of data protection is not available, so please note when ordering this service that the Service Provider cannot guarantee that the healthcare provider will handle the data in accordance with the Regulation.

Notification in the event of an emergency

Content of data processing, scope of processed data

The service also aims to ensure that when you receive healthcare abroad, we can notify your provided contacts via SMS.

To do this, you need to upload the name and phone number of the person to be notified on the websites.

Entering data is optional, not mandatory.

In all cases, please consult the contact person and provide them with this Privacy Policy as we will also handle their personal data.

The contact person is also entitled to the rights contained in this Privacy Policy.

Purpose of data processing

Providing the service to you.

Legal basis for data processing

Data processing is based on the performance of a contract with you, as the subscriber to the service, on the websites under Article 6 (1) (b) of the Regulation.

Duration of data processing

The data are processed during the use of the service, so if you request the deletion of your data or the service contract, between the Data Controller and you, terminates the data will also be deleted. In addition, you are entitled to make changes to the data at any time during the term of service, which also entails the deletion of previous data.

Third parties accessing data

The contact information is not known to anyone outside the Data Controller.

Invoicing

Content of data processing, scope of processed data

When ordering and paying for the service, the Data Controller shall issue an invoice for the service fee.

The invoice contains your name and billing address that you provided during the registration, as the required content by the law.

Purpose of data processing

Issue of an invoice compliant with the law.

Legal basis for data processing

Issue of an invoice pursuant to tax related Act on VAT, i.e. fulfilment of a legal obligation under Article 6 (1) (c) of the Regulation.

Duration of data processing

We are required to keep invoices for 8 years as required by the Accounting Act.

Third parties accessing data

Contact details will not be known to anyone other than the Data Controller unless the National Tax and Customs Administration of Hungary has access to the invoice details during a control.

Sending newsletter

Content of data processing, scope of processed data

If you specifically consent to this, the Data Controller sends you marketing letters. Your name and e-mail address shall be processed by the Data Controller.

Purpose of data processing

Marketing activities.

Legal basis for data processing

The data processing is based on your explicit consent pursuant to Article 6 (1) (a) of the Regulation.

Duration of data processing

Your data will be processed for the purpose of sending newsletter until you unsubscribe from it or your registration is terminated.

Third parties accessing data

Contact details will not be known to anyone other than the Data Controller unless the National Tax and Customs Administration of Hungary has access to the invoice details during a control.

Data processed for complaint handling

Content of data processing, scope of processed data

If we deal with a complaint in connection with the service, we will handle your complaint and will also handle the processing of personal data during the administration. We handle your name, contact details (email address, telephone number, postal address) and complaint. We record the complaint if it is in writing, or if the verbal complaint is not immediately resolved.

Purpose of data processing

The purpose of data processing is to implement complaints management in accordance with legal requirements.

Legal basis for data processing

The legal basis for data processing is the fulfilment of obligations under the Consumer Protection Act pursuant to Article 6 (1) (c) of the Regulation.

Duration of data processing

Pursuant to the Consumer Protection Act, the record shall be kept for 5 years after the complaint has been handled. If the oral complaint can be rectified immediately, the processing of the data will be limited to the duration of the administration.

Third parties accessing data

Your data will not be known to anyone outside the Data Controller.

Data processing by data processor

We use different companies with whom we have a data processing contract to manage and store the data and provide them with the data required for the purposes below. The following data processors process the data:

Company	Address	Activity
Magyar Hosting Kft.	H-1132 Budapest, Victor Hugo u. 18-22.	server provider
Net-Tech Consulting Kft.	H-1191 Budapest Kisfaludy utca 16. 6/18.	mail system provider
Magyar Posta Zrt.	H-1138 Budapest, Dunavirág utca 2-6.	delivery of orders
OTP Mobil Kft.	H-1093 Budapest, Közraktár u. 30-32.	online credit card payment
KBOSS.hu Kft.	H-1031 Budapest, Záhony utca 7.	invoice program provider
PRÍMADÓ 45 Kft.	H-1068 Budapest, Benczúr u. 1.	bookkeeping
Olasz László	https://surgossegikartya.hu	Web developer

The data processor may only execute instructions which have been previously recorded in writing. A written contract shall be concluded between the controller and the processor, which shall include the data transferred by the controller to the processor and the processor's activities with them.

- Employees processing personal data are bound by confidentiality.
- The data processor implements organizational and technical measures to ensure data security.
- The processor assists the controller in fulfilling its obligations.
- The data processor shall return any personal data to the controller or deletes existing copies, with the exception of Member State or Union law requiring the storage of data.
- The data processor facilitates and enables on-site audits performed by the data controller or with the assistance of an auditor appointed by the data controller.
- If the data processor seeks the assistance of a further data processor, it shall be subject to the same obligations as originally set out in the contract between the data processor and the data controller.

Data security

When operating IT systems, the necessary authorization, internal organization and technical solutions ensure that your data cannot be accessed by unauthorized persons, and that unauthorized persons cannot erase, save or modify the data. We also enforce the privacy and data security requirements of our data processors.

We keep record of possible privacy incidents, and if necessary, we will inform you of incidents that occur.

Cookie

In the case of the Customer's consent to data processing, the Service Provider shall use a unique identifier, the so-called "information files" (cookie) on the Customer's computer when using the Website.

Cookies are not computer programs, only small information files that allow a website to record information about Customer's browsing habits.

Most websites use cookies because they help make the customer experience on the Internet more convenient and easier to manage. Cookies allow a website to provide personalized services (such as remembering login details, products placed in a shopping cart, or content relevant to that Customer).

There are different types of cookies: temporary cookies (session cookies), which are deleted when you close your browser, and permanent cookies, which are not deleted by the browser but remain active until you delete it or expire (which depends on the length of time the web page has specified as the cookie lifetime).

The permanent cookie is stored by the browser for a specified period of time, unless previously deleted by the Customer, however, the temporary cookie is automatically deleted by closing the browser.

In addition, the purpose of data processing by cookies may be to collect anonymous attendance information. The Service Provider may transfer the data processed by the cookie placement to a third party in an anonymous form.

If the Customer does not consent to the placing of a cookie, he may do so through the settings (disable, revoke) made in his browser. In this case, it may limit or prevent the use of certain services.

If the cookie is not placed on a temporary basis, the Service Provider process the data for 90 days or until the Customer withdraws its consent in the above manner.

These cookies are provided by Google Inc. (1600 Amphitheater Parkway, Mountain View, CA 94043, USA) and are used through the Google Adwords advertising system. The processing of data by Google shall be deemed to be subject to an adequate level of protection of personal data.

Cookies provided by Google are sent to the visitor's computer only when you visit certain subpages, so they store only the fact and time of the visit to that subpage, and do not store any other information. The following cookies are used:

The external service providers, among them Google stores these cookies when Customer has previously visited the advertiser's website and on that basis displays ads to Customer on websites of third-party vendors, including Google.

Customer may disable Google's cookies on the Google Ads Disable Page. (You may also advise Customer that the Network Advertising Initiative opt-out page may also block third-party cookies.)

How do you control and disable cookies?

All modern browsers allow you to change your cookie settings. Most browsers automatically accept cookies by default, but they can usually be changed to prevent automatic acceptance and to offer you the choice of whether or not to allow cookies each time.

Please note that since the purpose of cookies is to facilitate or enable the use and processes of the website, by preventing or deleting the use of cookies, our Clients may not be able to use the full functionality of our website or the website may not function as intended in your browser.

You can find the cookie settings for the most popular browsers at the following links:

- [Google](#)
- [Chrome](#)
- [Firefox](#)
- [Microsoft Internet Explorer 11](#)
- [Microsoft Internet Explorer 10](#)
- [Microsoft Internet Explorer 9](#)
- [Microsoft Internet Explorer 8](#)
- [Microsoft Edge](#)
- [Safari](#)

Process aggregated, anonymized data

At each access level of the website, the Service Provider's servers automatically register (log) the Client's IP address, the type of operating system and browser used, the URL of the pages visited, and the time of visit. The Service Provider processes such data only in aggregate, anonymous and processed form for the purpose of correcting any errors on the website, improving their quality and for statistical purposes.

The Service Provider has the right to make the above-mentioned data available to third parties in aggregate, anonymous and processed form, when using the following services: Google Analytics, Google AdWords, Visual Website Optimizer.

Rights of the data subject

Handling of privacy requests

If you have any questions or concerns regarding data processing, please send your request by post to 1146 Budapest, Thököly út 81., Hungary or send it electronically to the adatvedelem@surgossegikartya.hu e-mail address. We will send our replies to your address without delay and within a maximum of 30 days.

Your rights regarding data processing

Within the duration of data processing you have the following rights under the provisions of the Regulation:

- Access to personal data and information,
- Right to rectification,
- Right to restriction of processing,
- Right to erasure ("right to be forgotten"),
- Right to object,
- Right to data portability.

If you intend to exercise your rights, it involves your identification and we will need to communicate with you. Therefore, for the identification, personal data will be required (but the identification may only be based on data that we may otherwise treat you). Your complaints regarding the data processing will be able to access in our e-mail account within this privacy policy's timeframe.

Complaints regarding data controlling will be answered no later than 30 days.

Right of withdrawal of consent

You are entitled any time to withdraw your consent to the processing of your data, in which case the provided information will be deleted from our systems.

The right of access to personal data and information

You are entitled to receive feedback on whether your personal data is being processed and, if data processing is in progress you are entitled to:

- receive access to the treated personal data and
- be informed about the following information by the Data Controller:
 - the categories of your personal data;
 - information about the recipients or categories of recipients to whom your personal data have been or will be disclosed by us;
 - the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

- the existence of the right to request from us rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject or to object to such processing in the case of data processing based on legitimate interests;
- the right to submit a complaint to the supervisory authority;
- if the data was not collected from you, any available information about your personal data source;
- the existence of automated decision-making process (if it is used), including profiling, and at least in those cases the meaningful information about logic involved as well as the significance and the envisaged consequences of such processing for you;
- the purposes of the processing;

The purpose of the exercise of the right is to establish and control the lawfulness of data processing and therefore, upon requesting multiple information, we may charge a reasonable cost reimbursement in return for the fulfilment of information.

The access to your personal data is granted to you by sending the treated personal data and information via e-mail, after that we have made your identification.

Please indicate in your claim that you are requesting access to personal data or requesting information about data controlling.

Right to rectification

You are entitled to request the rectification of your inaccurate personal data.

Right to restriction of processing

You are entitled to request the restriction of processing where one of the following applies:

- you dispute the accuracy of your personal data, for a period enabling us to verify the accuracy of the personal data, if no verification is required, no restrictions will be applied;
- the processing is unlawful, and you oppose the erasure of personal data and requests the restriction of their use instead;
- we do not need the personal data for the purpose of the processing, but they are required by you for the establishment, exercise or defense of legal claims; or
- You have objected to the processing, but because our legitimate interest can be a legal ground to our processing, in this case the restriction is pending until the end of the verification whether our legitimate grounds override those of yours.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

Right to erasure ("right to be forgotten")

You are entitled to request to erasure of your personal data without undue delay if one of the following reasons consist:

- personal data are no longer necessary in relation to the purpose for which they were collected or processed;
- you withdraw your consent on which the processing is based and there is no other legal basis for data controlling;
- you are object against the legitimate interest-based data processing and there is no overriding legitimate grounds (as legitimate interest) for the data controlling,
- we have processed the personal data unlawfully and this was established based on the complaint,
- the personal data have to be erased for compliance with a legal obligation in Union or Member States' law to which we are subject.

If we have made the personal data public and is obliged pursuant any of the abovementioned to erase the personal data, we, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data. As the main rule, your personal information will not be disclosed.

Erasure shall not apply if data processing is required:

- to exercise the right of freedom of expression and information;
- to compliance with a legal obligation (such as billing processing, since the retention of the bill is required by law) which requires processing by Union or Member State law to which we are subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- to establish, exercise or defense of legal claims (e.g. if we have a claim against you and you have not yet completed that, or a consumer, or a data processing complaint handling is in progress).

Right to object

You are entitled to object, on grounds relating to your particular situation, at any time to processing of your personal data based on legitimate interest. In this case, we are not be able to process your personal data unless compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims it is demonstrated by us.

Right to data portability

If your data processing is necessary for the performance of the contract or data processing is based on your voluntary consent, you have the right to request that the information you have provided to us be provided to you in a machine-readable format, in XML, JSON, or CSV. If this is technically feasible, you can request that the data be forwarded to another data controller in this format.

Remedies

If you believe that we have violated any statutory provision on data processing or have not completed your request, you have the right to initiate a procedure in order to eliminate a putative unlawful data processing before the National Data Protection and Information Authority (address: 1530 Budapest, Pf. : 5, e-mail: ugyfelszolgalat@naih.hu).

In addition, please be advised that in the event of a violation of data processing laws or of the Data Controller's failure to comply with any request, you may institute civil proceedings against the Data Controller in court.

Automated decision making, profiling

There is no automated decision making and profiling during the Data Controller's data processing.

What to do if you have any questions

If you have any questions or would like more information, please contact our Privacy Officer or contact us.