

PRIVACY POLICY

1. THE DATA CONTROLLER

Data Controller: Quantbio Korlátolt Felelősségű Társaság

Company registration no. 09-09-027467

Registered by the Company Registry Court at the Regional Court of Debrecen

Registered seat: 4026 Hungary, Debrecen, Csemete utca 32.

VAT no.: 25439623-2-09

Statistical no. 25439623-7219-113-09

E-mail: info@prelife.hu

(hereafter referred to as: “**Data controller**”)

Staff member responsible for data protection issues: Dr. Gábor Horváth

(DHG Law Office; +36 1 301 04 06; +36 20 9233 275; gabor.horvath@dhg.hu)

Data protection registration no.: NAIH-125413/2017

2. THE SCOPE OF THE PRIVACY POLICY

This privacy policy was written in connection with the processing of personal, health and other special data collected on the www.prelife.hu and the www.prelifemed.com websites in relation to the services provided there or otherwise acquired by the Data controller.

3. APPLICABLE LEGISLATION AND PRINCIPLES

When processing data, Data controller shall act in observance of the prevailing provisions of the following laws:

- ✓ Act XLVII of 1997 *on the Processing and Protection of Health Care Data and Associated Personal Data*;
- ✓ Act CXII of 2011 *on the Right of Informational Self-Determination and on Freedom of Information* (hereafter referred to as “Privacy Act”);
- ✓ Act CLIV of 1997 *on Health*;
- ✓ Ministry of National Economy decree no. 62/1997. (XII.21.) *on Issues Related to the Processing and Protection of Health Care Data and Associated Personal Data*;
- ✓ Act CVIII of 2001 *on Certain Issues of Electronic Commerce Activities and Information Society Services*;
- ✓ Act XLVIII of 2008 *on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities*;

Data controller shall process personal and special data only for the purposes and time specified herein. Data controller shall process only such personal and special (especially health) data, which are essential and suitable for the purposes of data processing.

Only those people may get access to Data that Data controller acquires during data processing who are commissioned or employed by Data controller and who have responsibilities related to the particular data processing.

4. DEFINITIONS

Data types:

Personal data shall mean any information relating to the data subject, in particular by reference to one's name, identification number or to one or more factors specific to one's physical, physiological, mental, economic, cultural or social identity, and any reference drawn from such information pertaining to the data subject;

Special data shall mean personal data revealing racial origin or nationality, political opinions and any affiliation with political parties, religious or philosophical beliefs or trade-union membership, and personal data concerning sex life, health, pathological addictions, or criminal records;

Health data shall mean any data disclosed by the data subject or any other person or identified, examined, measured, derived by the health care network relating to the data subject's physical, intellectual and psychological condition, his/her pathological addictions, the conditions of diseases or death, the causes of death; moreover, any and all data that may be related or which may influence the foregoing (e.g., behavior, environment, occupation);

Data suitable for personal identification shall mean the first and family name, maiden name, date and place of birth, the mother's maiden first and family name, permanent address, address of residence, social security number (hereafter referred to as SSN) together or any of these on its own if suitable for the identification of the data subject;

Definitions Related to Data Processing:

Data subject shall mean any natural person directly or indirectly identifiable by reference to specific personal data; Such people include the visitors of the website, people downloading free material, subscribing to the newsletter and/or ordering educational materials with reference to their personal data;

Visitor shall mean any person browsing the websites indicated below;

Client shall mean any Visitor who uses any of the services of the website (e.g. ordering of Educational materials, Calendar function);

Consent shall mean any freely and expressly given specific and informed indication of the will of the data subject by which s/he signifies his/her agreement to personal data relating to him/her being processed fully or to the extent of specific operations;

Objection shall mean a declaration made by the data subject objecting to the processing of their personal data and requesting the termination of data processing, as well as the deletion of the data processed;

Data controller shall mean a natural or legal person, or organization without legal personality which alone or jointly with others determines the purposes and means of the processing of data; makes and executes decisions concerning data processing (including the means used) or have it executed by a data processor commissioned by it;

Data processing shall mean any operation or the totality of operations performed on the data, irrespective of the procedure applied; in particular, collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronizing or connecting, blocking, deleting and destructing the data, as well as preventing their further use, taking photos, making audio or visual recordings, as well as registering physical characteristics suitable for personal identification (such as fingerprints or palm prints, DNA samples, iris scans);

Data transfer shall mean ensuring access to the data for a third party;

Disclosure shall mean ensuring open access to the data;

Data deletion shall mean making data unrecognizable in a way that it can never again be restored;

Tagging data shall mean marking data with a special ID tag to differentiate it;

Blocking of data shall mean marking data with a special ID tag to indefinitely or definitely restrict its further processing;

Data process shall mean performing technical tasks in connection with data processing operations, irrespective of the method and means used for executing the operations, as well as the place of execution, provided that the technical task is performed on the data;

Data processor shall mean any natural or legal person or organization without legal personality processing the data on the grounds of a contract concluded with the data controller, including contracts concluded pursuant to legislative provisions;

Third party shall mean any natural or legal person, or organization without legal personality other than the data subject, the data controller or the data processor;

Data protection incident shall mean the unlawful management or processing of personal data, in particular unauthorized access, alteration, transfer, disclosure, deletion or destruction, as well as accidental destruction and damage.

Terms related to the processing of health data:

Healthcare service: all activities which aim to deliver examination, treatment, continuous care, nursing care and medical rehabilitation for the data subject or the processing of relevant medical records in the interest of promoting health, preventing, early detection and treating diseases, improving a condition arising as a result of a disease or preventing further deterioration of health including all activities related to medicines, therapeutic appliances and medical services as well as ambulance and patient transportation service and obstetrical care;

Confidential medical data: any health data or data suitable for personal identification acquired by the data controller during the provision of healthcare services, as well as any other data on necessary, ongoing or completed healthcare services or in connection with such services.

Health and medical records: notes, records or data recorded in any other way, regardless of the carrier or form thereof, that contain health or other data suitable for personal identification that will come to the attention of a health care worker in the course of delivering healthcare services;

Attending physician: a physician or physicians who determine the diagnosis and treatment plan to respond to the patient's illness or health condition, furthermore, a physician or physicians performing procedures and interventions as part of such plans who are held responsible for the medical treatment of the patient;

Health care: a set of healthcare services delivered in connection with the patient's health status;

Close relative: spouse, direct-line relative, adopted, step and foster child, adoptive, step and foster parents, sibling, and common-law spouse;

Patient: a person using or receiving healthcare services.

Medical emergency: a sudden change in health which, in the absence of urgent medical care, would endanger the patient's life, or result in a severe or permanent health impairment;

Examination: an activity which aims to assess the patient's health status, to promote their health, to detect illnesses and the risks thereof, to diagnose specific disease(s), to establish the likely outcome and any changes of such disease(s), and to establish the effectiveness of medical treatment, as well as the onset and cause of death;

5. DATA PROCESSING

The Legal Basis of Data Processing

Data controller shall process the data based on the voluntary consent of the data subject while certain data are processed by Data controller in line with legal stipulations. Data controller shall inform Data subject of such data processing in this policy or separately. In case the legal basis of data processing is not indicated under a particular point, data processing is based exclusively on your consent.

Data controller does not verify the data provided for it. The person providing the data shall be responsible for the suitability of the data provided. In line with this, when providing their email address, the Client/Visitor takes responsibility that s/he would be the only person using the service with the email address given. All responsibilities arising in connection with the given email address shall be borne solely by the Client/Visitor registering the email address.

5.1. Data of Website Visitors

When visiting the www.prelife.hu and www.prelifemed.com online sites, the data of the Visitor's computer generated when viewing the website are recorded automatically. Such data include the IP address, the time and date of the visit, the pages visited, the website from which the visit took place, the type of the browser used, the type of the operating system, and the domain name and address of the Internet service provider. The automatically recorded data are logged by the system without the special statement or action of the Visitor when logging in and logging out. These data cannot be connected with other personal data of Visitor with the exception of cases required by law.

The Objective of Data Processing

The technical development of the IT system, control and customization of the operation of the service, and the protection of the Visitor's rights. In the case of any abuse, data may be used to identify the source of abuse in cooperation with the internet service provider of Visitors and the authorities.

The Legal Basis of Data Processing:

Besides the consent of the data subject, Article 13/A, Section 3 of Act CVIII of 2001 *on certain issues of electronic commerce activities and information society services*;

The Duration of Data Processing:

30 (thirty) days from the time of visiting the website.

5.1.1. References and Links

The website of Data controller may also include such links that are not operated by the Data controller and only serve the purposes of providing information to Visitors. Data controller has no influence whatsoever on the content and security of websites operated by partner companies and thus is not liable for these. Please read the Privacy Policy of pages visited by you before providing your data in any form on these websites.

5.1.2. Cookies

Cookies are small text files stored on the hard drive of the computer or mobile device and activated at the time of a later visit. Websites use cookies to record information related to the visit (pages visited, time spent on our pages, browsing data, logouts, etc.) as well as personal settings, however, these data cannot be associated with the personality of the Visitor. Cookies help us create a more user-friendly website and improve the online experience of our Visitors.

Most browsers automatically accept cookies but Visitors may also delete or reject these. As all browsers are different, you can set your preferences regarding cookies on your own with the help of the toolbar of your browser. If you do not want to enable any cookies from the websites visited, you may modify the settings of the browser so that you get notifications about the cookies sent or you may simply reject cookies sent by all or certain websites. At the same time, you may delete the cookies stored on your computer, notebook or mobile device at any time. For further information on additional settings, please visit the help center of your browser.

If you decide to disable cookies, you cannot take advantage of certain functions of the websites (for example, the website does not remember that you have remained logged in).

The Objective of Data Processing:

Storing of your personal settings: During your visit to the website, the system identifies you with the help of normal cookies as a unique user to remember your language settings and login status.

Anonymous statistics log: Each time you visit the website, the web analytics software stores anonymous, normal cookies that help us learn about how many people have visited the website and which information and content they are interested in. We store all analytical information anonymously and use it for technical and marketing purposes. Thus, for example, we can learn about how many visitors we have a month. However, we do not know the names of our visitors.

Identification of anonymous and logged-in visitors: Websites use a cookie to decide if you are an anonymous or logged-in visitor. If you have logged in, the website offers a somewhat different content than for anonymous visitors. If this cookie is not present or you disable it, the website thinks that you are an anonymous visitor; if, however, the cookie is enabled, the website remembers that you are “logged in”.

The Duration of Data Processing:

We differentiate between two types of cookies: session cookies and persistent cookies. The session cookies are stored by the computer, notebook or mobile device only temporarily until you leave the website; these cookies help the system in remembering information while you go from one page to the other and thus you do not have to provide or fill in information repeatedly. The persistent cookies are stored on the computer, notebook or mobile device also after leaving the website. With the help of these cookies, the website (although not identifying you personally) recognizes you as a returning visitor. The persistent cookies are stored on the computer or mobile device as a file for a maximum of 12 (twelve) months.

5.1.3. Facebook Pixel

The Data controller uses Facebook pixel, which is a JavaScript code which enables the Data controller to collect statistical data on visits not traceable to people, thus with the statistical information from the operations executed by the visitors to the website it may make its Facebook advertisements more effective. You can find more information on the settings of Facebook advertisements and the privacy policy used on Facebook sites at www.facebook.com/about/privacy.

The duration of data processing is 180 days in this case.

5.1.4. Google Analytics and Adwords

Data controller measures visitor activity with the use of the services of GoogleAnalytics and Adwords. When using this service such non-personal data are transferred that are not suitable for the identification of the data subject.

Google Adwords remarketing is such a function that offers relevant advertisements for those users who have already visited the website while they are browsing the other websites of the Google Display Network. The remarketing code uses cookies to tag Visitors. The visitors of the website may disable these cookies and read additional information related to the Google privacy policy at the following sites: <http://www.google.hu/policies/technologies/ads> and <https://support.google.com/analytics/answer/2700409>.

If the Visitor disables the remarketing cookies, the personalized offers will not appear for them.

You may read Google’s privacy policy here: www.google.hu/policies/privacy

5.1.5. Adobe Flash Player

Adobe Flash Player, which is used for running certain types of animated banners and different videos (Youtube, Vimeo), is capable of storing information on your computer, notebook or mobile device.

Enabling Flash cookies cannot be set in the web browser. If you do not want to accept Flash cookies, you have to have such settings it at the website of Adobe. You can find more information on the following website:

www.adobe.com/hu/privacy/cookies.html

Please keep in mind that in case you disable Flash cookies, you cannot use certain functions of the website, for example, the videos embedded in articles may not be displayed correctly.

5.2. Ordering Educational Materials

The educational material of Data controller may be bought at the www.prelife.hu website, under the “Course” menu with the help of the order form you can fill in and submit online.

Data controller requests the following data in the order form:

- ✓ family name;
- ✓ first name;
- ✓ e-mail address;
- ✓ billing address (billing name, country, city, postal code, street, house no.);
- ✓ telephone number.

If additional health data are needed for the use of the course, we inform Client about it in advance in all cases.

With the data specified above, Client creates a user profile after successful payment.

Besides those mentioned above, the Data controller processes the registered user name, password and the data of the order (order no., the time and date of order or request for proposal, the data of the course material, its price, the total cost of the order, the last date of logging in to the user account, the Client’s IP address, and the coupon code).

The Objective of Data Processing:

Creation and management of the Clients’ accounts, processing of orders, contacting clients, recording orders, providing for related accounting obligations, and offering discounts.

The Legal Basis of Data Processing:

Besides the consent of the data subject, Article 13/A, Section 3 of Act CVIII of 2001 *on certain issues of electronic commerce activities and information society services* and Article 169, Section 2 of Act C of 2000 *on Accounting*;

The Duration of Data Processing:

Personal data are deleted after the completion of the order, the data on the receipt related to the order are kept for 8 years after the purchase.

Data controller does not verify the data provided for it. The person providing the data shall be responsible for the suitability of the data provided. When providing their email address, the Client/Visitor takes responsibility that s/he would be the only person using the service with the email address given. All responsibilities arising in connection with the given email address shall be borne solely by the Client/Visitor registering the email address.

In the case of online credit card payment, you are automatically redirected to the website of the following data controllers:

- Barion Payment Zrt. (Registered seat: 1117 Budapest, Infopark sétány 1. Building I., Floor 5., Door 5.) Further information: www.barion.com (Data transferred: the name and price of items to be bought and the total amount).

5.3. Calendar

You may access the Calendar application with the help of the path provided during the clinical study. The use of the Calendar requires prior registration.

Data controller requests the following data during registration:

- ✓ first name;
- ✓ user name;
- ✓ e-mail address;
- ✓ password.

With the data specified above, Client creates a user profile, which may be accessed by Client using a link sent by Data controller via email.

Besides those mentioned above, Data controller processes the IP address of Client and the date of their last login. Various health data have to be provided to be able to use the calendar and these data are evaluated automatically by the calendar application. The health data provided during the use of the calendar are not used by Data controller for any other purposes beyond the automatic operation of the calendar and they are not used for any statistical evaluation or other analysis.

The Objective of Data Processing:

Creation and management of the Clients' accounts. Ensuring the use of the application.

The Legal Basis of Data Processing:

Besides the consent of the data subject, Article 13/A, Section 3 of Act CVIII of 2001 *on certain issues of electronic commerce activities and information society services*;

The Duration of Data Processing:

Personal and health data are deleted when the profile is deleted.

5.4. Newsletter

Data controller sends newsletters addressed to a natural person only with the consent of the data subject. When signing up on the websites, the data subject approves of the Data controller sending electronic newsletter to the e-mail address provided by giving their name and e-mail address. If you provide your address, you also make sending advertising material by mail possible. Data controller may send advertising material by mail without the prior consent of the data subject if a possibility is provided to cancel all further advertising materials.

The provided personal data are stored by Data controller separately from data given for other purposes.

The Objective of Data Processing:

To provide comprehensive general and customized information for the addressee on current information, educational materials, news about Data controller, and to send educational articles and materials.

The Duration of Data Processing:

Data controller reviews the newsletter list every 5 (five) years and requests a confirmation for sending the newsletter after 5 (five) years. The data of those data subjects who do not provide such a consent for sending the newsletter are deleted within 30 (thirty) days following the delivery of the email to that purpose.

You may unsubscribe from the newsletter at any time by clicking on the link at the bottom of the electronic letters or by sending a cancellation request to info@prelife.hu or to 4026 Hungary, Debrecen, Csemete utca 32, addressed to the Data controller. In such cases your personal data provided for the purposes of sending the newsletter are deleted immediately or on the working day following the receipt of such a request the latest. Of course, you always have the opportunity to subscribe to our newsletter again.

5.4.1. Facebook and LinkedIn

Data controller is also available on Facebook and LinkedIn.

Visitor may sign up for the newsfeed of Data controller's Facebook site by clicking on the "like" link and may unsubscribe by clicking on the "dislike" link; they may also delete the unwanted news on the message board using the settings of the message board.

You may also request admission to the closed group of the Facebook page of Data controller and may leave it at any time.

You may learn more about the privacy policy of the Facebook page here: <http://www.facebook.com/about/privacy>.

Facebook users may also sign up for the newsletter with the help of the "Facebook connect" lead ads form in which case the e-mail address and the first name is added to Data controller's database.

Data controller is also available on LinkedIn; the Visitor may sign up to the newsfeed by clicking on the "follow" button and unsubscribe by clicking on the "unfollow" button. Further information on the privacy policy of LinkedIn: www.linkedin.com/legal/privacy-policy.

5.5. Blog and Registration

Under the "Blog" menu of the website, the Visitor may read educational articles. The Visitor can comment on the articles without registration. However, a user account has to be created to read the full content of the Blog. The user account can be created under "Registration" at the top of the website.

Data controller requests the following data during registration:

- ✓ first name;
- ✓ e-mail address;

Additional data may also be given in the User account, in line with the following, but these are only optional.

The User account stores the following data:

- ✓ First name: *required*
- ✓ Family name: *not required*
- ✓ Phone number: *not required*
- ✓ E-mail address: *required*
- ✓ Username: *required* (same as the e-mail address)
- ✓ Password: *required*

- ✓ Date of joining: *recorded automatically*
- ✓ User level: *recorded automatically*

The data provided may be modified under the “Modify or delete profile” menu

The Objective of Data Processing:

The registration and management of the registered Visitor’s account.

The Duration of Data Processing:

Data processing lasts until the deletion of the user profile.

5.5.1. Management of Comments

Registered Visitors may comment on different topics and blog entries. In the case of your contribution, we may disclose your opinion and/or use it for marketing purposes.

Data controller processes the following data: ID number, date, time, username and/or name, IP address of visitor’s computer, the review, and additional personal data possibly given in the written review. If you provide your consent, the Data controller may disclose the following data: date, time, username and/or name, the review, and the text of the review.

The Objective of Data Processing:

The development of services, disclosure and documentation of the reviews of visitors, the differentiation of the personality of the visitors.

The Duration of Data Processing:

10 (ten) years

5.5. Contact and Advising

The Visitor or Client may contact the Data controller using the contact details provided.

The Objective of Data Processing:

Contact, responding to inquires of the data subject.

The Duration of Data Processing:

The messages are processed by Data controller until the given request/question is addressed/answered and are deleted within 30 (thirty) days after the closing of the request/question; if, however, it is necessary due to reasons related to tax law or accounting, the protection of the rights of the Data controller or the interest of the Data subject, they are archived and stored for the time necessary.

5.5.1. Advising and Patient Information

In case the Data subject contacts the Data controller for the purposes of advising, the data controller may request Data subject to provide health or other special data for the purposes of adequate advising. In such cases the consent to the processing of health and other data suitable for personal identification and related to healthcare services should be assumed as granted unless there is a statement to the contrary.

The health and other special data needed for the requested advising can only be accessed by the physician. Any other people involved in providing healthcare services for the data subject (e.g., assistant) may process health data in line with the orders of the physician responsible for the treatment and to the degree necessary for performing their duties.

The recording of health data is part of advising. The physician responsible for the therapy shall decide which health data shall be recorded in line with the rules of the profession.

Health data may be transferred to other physicians or third parties only if requested by the Data subject, moreover, the consent of the Data subject shall be requested for sharing the recorded data with a physician who has not treated the data subject before, stating also that the health data may not be transferred to the GP of data subject only in case the data subject specifically objects. In case of urgent need, however, all health and other data suitable for personal identification known by the physician responsible for the treatment and related to the healthcare services may be transferred.

Data controller shall keep all confidential medical information that it has become aware of.

The Data controller and its agent shall be exempt from the obligation of confidentiality if

- ✓ the data subject or their legal representative provided consent in writing to forward the health and other data suitable for personal identification, within the limitations included therein,
- ✓ the forwarding of the health and other data suitable for personal identification is required by law.

The data subject shall be entitled to receive information about data processing related to the healthcare services, they may get to know the health and other data suitable for personal identification related to them, may inspect the healthcare documentation and may get copies of these, at their own cost. Such a right shall also be granted during the care of the data subject to the person authorized by data subject in writing, and after the end of the care of data subject, the person authorized by him/her in a fully conclusive private deed.

The Objective of Data Processing:

Answering the health-related questions of Data subject and treating and informing the data subject.

The Legal Basis of Data Processing:

Article 12, Section 2 of Act XLVII of 1997 *on the processing and protection of health care data and associated personal data;*

The Duration of Data Processing:

Health information shall be preserved for at least 30 years after the recording of data, and final medical reports shall be kept for 50 years. After the compulsory time of keeping these data, the data may be kept for a longer time for the benefit of healthcare services or scientific research if justified. If continued preservation is not justified, the records have to be destroyed.

Images made with imaging diagnostics shall be kept for 10 years after they are made and the medical report about the image shall be preserved for 30 years after its date.

5.6. Questionnaire

By filling in the questionnaire, you can share your opinion on and experience with the IVF method or the Calendar.

You need to provide the following personal data to be able to fill in the questionnaire. If you give us your personal data, we will have the opportunity to respond to your experience described when filling in the questionnaire.

- ✓ family name
- ✓ first name
- ✓ e-mail address

The Objective of Data Processing:

The development of services and contacting users.

In other matters not regulated here, the personal data are processed in line with those specified in point 5.5.

5.7. Pre-life Method

Data controller does not participate in clinical studies and has no access to personal data recorded or otherwise encountered during the studies. Data controller receives health data in an anonymized form. Data controller performs IT analysis on the anonymized data. Anonymized data are not linked to patient IDs and may not be traced back to the Data subject.

5.8. Career

The consent of data subject to the processing of personal data included in résumés sent to Data controller in any form with the purposes of job search shall be presumed. Data controller may forward the résumé and/or the personal data included in it to third parties only with prior authorization by the applicant.

The Objective of Data Processing:

Selecting the most suitable applicants.

The Duration of Data Processing:

In case the data subject specifically prohibits the processing of such personal data, these data are deleted by data controller. If the deletion of data is not requested by the applicant, the data, the résumé and the data included in it (unless the person applied for a specific job advertisement) are automatically deleted within 1 year after sending it. The résumés of people applying for a specific job advertisement are deleted immediately after a person has been selected for the position.

6. DATA SECURITY

6.1. SSL System

Data controller uses an SSL data security encryption software on its websites. Any information that data subject shares with Data controller is automatically encrypted and protected when transferred in the network. As soon as the information is received by our server, it is decoded using a unique private key. SSL enables the browser to connect to the website and provides a secure communication channel in a transparent way.

6.2. Security Activities

Data controller ensures that it is verifiable which authorities the personal data are or may be transferred to with the help of data transmission equipment, who entered personal data and data into the system and when, and also guarantees that the system can be recovered in case of malfunction. A report is made on the errors encountered during automated processing.

Data controller shall process personal data confidentially and shall not disclose them to unauthorized persons. It shall protect personal data especially from unauthorized access, alteration, transfer, disclosure, deletion or destruction, as well as accidental destruction and damage, as well as from such personal data becoming inaccessible due to changes in the technology used. It shall take all security measures in order to ensure the technical protection of personal data.

7. DATA TRANSFER

Data controller may transfer your personal data only to the data processors and data controllers indicated in the present privacy policy and only in line with the stipulations of the present privacy policy. By consenting to detailed data processing, you also consent to the necessary transfer of data (e.g., in case you choose the option of credit card payment, we direct you to the website of Barion Payment Zrt.). Data controller may transfer your personal data to other data controllers only based on your prior consent.

Data controller shall keep a data transfer register for the purposes of controlling the legality of data transfer and informing the data subject, which shall include the time of transferring the personal data processed by it, the legal basis and addressee of data transfer, the specification of the scope of personal data and other data specified by stipulations of law regulating data transfer.

Data controller reserves the right to provide personal data processed by it to the competent authorities and courts according to their request in cases stipulated by law even without the specific consent of data subject.

The separate rules of transferring health data are specified in point 5.5.

8. DATA PROCESSORS

- ✓ Website maintenance is provided by Daniella Kitty Karvalics, sole proprietor, and Péter Kerényi, sole proprietor (address: 1033 Budapest, Vöröskereszt utca 14. 7/39.);
- ✓ Website hosting is provided by Tárhely.EU Kft. (registered seat:1144 Budapest, Ormánság u. 4.);
- ✓ Invoices are managed by Számlázz.hu (KBOSS.hu Kft.; registered seat: 2000 Szentendre, Táltos u. 22/b);
- ✓ In the case of orders made with the use of order forms and questionnaires, data are stored by SalesAutopilot Kft. (registered seat: 1089 Budapest, Golgota u. 3.);
- ✓ The data of those subscribing with the help of the Facebook lead generation form are also stored by the server of Zapier, Inc. (registered seat: 548 Market St #62411San Francisco, California 94104). (*currently active on the Privacy Shield list*).

9. RIGHTS AND LEGAL REMEDY

9.1. Information

Data controller, upon a request sent to its above-mentioned address, shall provide information in an understandable form maximum within 25 (twenty-five) days after the submission of such request (with regard to the same data free of charge once a year and above that for a fee) on the data of data subject processed by it or the data processor commissioned by it, their sources, the purpose of data processing, its legal basis, duration, the name, address of data processor, its activities related to data processing, the circumstances of the data protection incident, its effects, and the measures taken to remedy it, as well as the legal basis and addressee of data transfer in case the personal data of data subject is transferred.

Data controller shall keep a register for the purposes of controlling the measures taken in connection with the data protection incidents and informing the data subject, which shall include the scope of personal data in question, the scope and number of data subjects affected by the data protection incident, the time, circumstances, effects of the data protection incident, the measures taken to remedy such incident, as well as other data prescribed by law on data processing.

In case providing such information is denied, Data controller shall inform data subject in writing which law served as the basis for such denial and shall inform data subject on possibilities for legal remedy.

9.1.1. Data Processing for Purposes of Scientific Research

With authorization granted by the head of the institution or the data protection officer, the stored data may be viewed for the purposes of scientific research, however, no health or other data suitable for personal identification may be included in scientific publications in a way that would make the identification of the data subject possible. In the process of scientific research, no copy including data suitable for personal identification may be made of the stored data.

A register shall be kept on the people who viewed the stored data, the purpose and time of such viewing. The mandatory retention period of such a register is 10 years.

If a request for research is denied, such denial shall be explained in writing by the head of the institution or the data protection officer. In case the request is denied, the applicant may turn to a court. In terms of the initiation and conduct of legal proceedings, the stipulations of the act on the right of informational self-determination and the freedom of information concerning the legal proceedings in the case of the denial of the request for access to public information shall be governing.

9.2. Rectification

If the personal data does not correspond to reality and the data corresponding to reality is available for the Data controller, the personal data shall be rectified by Data controller.

Data subject and all recipients to whom data were transmitted for processing shall be notified by Data controller on such rectification. Notification is not required if it does not violate the rightful interest of the data subject in light of the purpose of processing.

If Data controller does not fulfill such request, it shall provide the factual and legal reasons for the denial in writing within 25 (twenty-five) days after the receipt of the request and shall provide information on the options for seeking judicial remedy and turning to the National Authority for Data Protection and Freedom of Information.

9.3. Erasure and Blocking

The personal data shall be erased if

- ✓ processed unlawfully;
- ✓ so requested by the data subject;
- ✓ incomplete or inaccurate and it cannot be lawfully rectified, provided that erasure is not disallowed by statutory provision of an act;
- ✓ the purpose of processing no longer exists or the legal time limit for storage has expired;
- ✓ so ordered by court or by the National Authority for Data Protection and Freedom of Information.

Personal data shall be blocked instead of erased if so requested by the data subject, or if there are reasonable grounds to believe that erasure could affect the legitimate interests of the data subject. Blocked data shall be processed only until the purpose of data processing exists, which excluded the erasure of the personal data.

Data subject and all recipients to whom data were transmitted for processing shall be notified by Data controller on such rectification or blocking. Notification is not required if it does not violate the rightful interest of the data subject in light of the purpose of processing.

If Data controller does not fulfill the request of data subject for erasure or blocking, it shall provide the factual and legal reasons for the denial in writing within

25 (twenty-five) days after the receipt of the request and shall provide information on the options for seeking judicial remedy and turning to the National Authority for Data Protection and Freedom of Information.

9.4. Objection

The data subject shall have the right to object to the processing of personal data

- ✓ if processing or transfer is carried out solely for the purpose of discharging the Data controller's legal obligation or for enforcing the rights and legitimate interests of the Data controller, the recipient or a third party, unless processing is mandatory;
- ✓ if personal data is used or disclosed for the purposes of direct marketing, public opinion polling or scientific research; and
- ✓ in all other cases prescribed by law.

In the event of objection, the Data controller shall investigate the cause of objection within the shortest possible time, maximum inside a 15 (fifteen-day) time period, adopt a decision as to merits and shall notify the data subject in writing of its decision.

If, according to the findings of the Data controller, the data subject's objection is justified, the controller shall terminate all processing operations (including further data collection and transmission), block the data involved and notify all recipients to whom any of these personal data had previously been transferred concerning the objection and the ensuing measures, upon which these recipients shall also take measures regarding the enforcement of the objection.

If the data subject disagrees with the decision taken by the Data controller or if the Data controller fails to meet the deadline of 15 (fifteen) days, the data subject shall have the right to turn to court action within 30 (thirty days) of the date of delivery of the decision or from the last day of the time limit.

9.5. Judicial remedy

In the event of any infringement of his rights, the data subject may turn to court action against the Data controller. The court shall hear such cases in priority proceedings. The burden of proof to show compliance with the law in terms of data processing lies with the Data controller.

The action shall be heard by the competent tribunal. If so requested by the data subject, the action may be brought before the tribunal in whose jurisdiction the data subject's home address or temporary residence is located. Any person otherwise lacking legal capacity to be a party to legal proceedings may also be involved in such actions. The National Authority for Data Protection and Freedom of Information may intervene in the action on the data subject's behalf.

When the court's decision is in favor of the plaintiff, the court shall order the Data controller to provide the information, to rectify, block or erase the data in question, to annul the decision adopted by means of automated data-processing systems, to respect the data subject's objection.

The court may order publication of its decision, where this is deemed necessary for purposes of data protection or in connection with the rights of large numbers of data subjects under protection by law.

In the event of any infringement of rights, the data subject may turn to court action against the Data controller. In terms of the judicial proceedings, the stipulations of Section 22 of the Data Protection Act, those of Book One, Part 3, Title XII of Act V of 2013 on the Civil Code (Sections 2:51. - 2:54.), and other laws relevant to court proceedings shall prevail.

9.6. Compensation

If Data controller causes any damage as a result of the unlawful processing of data of data subject or by any breach of data security requirements or if it violates the personality rights of data subject, a compensation may be demanded from Data controller. The data controller may be exempted from liability for the damage caused and the payment of compensation if it proves that the damage or the infringement of the personality rights of the data subject was caused by reasons beyond its control and falling outside the scope of data processing.

Data controller shall also be liable towards data subject for any damage caused by data processor and Data controller shall also pay the compensation due to data subject in the case of the infringement of the personality rights by data processor. The data controller may be exempted from liability and the payment of compensation if it proves that the damage or the infringement of the personality rights of the data subject was caused by reasons beyond its control and falling outside the scope of data processing. No compensation shall be paid where the damage was caused by intentional or serious negligent conduct on the part of the data subject.

10. MISCELLANEOUS PROVISIONS

Data controller shall be entitled to modify and amend the present Privacy Policy at any time. Such modifications may come into effect at the time of their publication on the website and you will be informed about such changes on the website.

You may ask for the help of the National Authority for Data Protection and Freedom of Information at any time in relation to data protection issues:

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