

REGULATIONS FOR PERSONAL DATA PROTECTION

Dear Sir or Madam,

The security and confidentiality of your data is of utmost importance to us. We would like to take this opportunity to assure you that we have always and will continue to do our best to provide you with data protection by applying appropriate technical and organisational security measures, including the use of appropriate protection when designing new services and solutions.

These terms and conditions serve to inform our clients as well as interested parties regarding the purpose, scope and categories in which their personal data will be processed including the duration of its processing as well as their rights regarding their personal data, as in accordance with the Act of 25 May 2018 on the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to personal data processing and on the free movement of such data as well as the repeal of Directive 95/46/EC (referred to as RODO/GDPR).

THE DATA ADMINISTRATOR AND THE DATA PROTECTION OFFICER

The Data Administrator is the American Heart of Poland S.A., 1 Sanatoryjna Street, 43-450 Ustroń (<https://ahop.pl>).

As a Data Administrator, we are responsible for ensuring the security of your personal data and the manner in which it is used in accordance with the applicable laws and provisions contained in the agreement. Any additional information can be obtained from the Data Protection Officer at sekretariat@ahop.pl or sent by post to the address of the registered office of the Company.

DATA SECURITY

In order to guarantee the security of your data, we conducted an Impact Assessment of Personal Data Processing, which takes into account the risks associated with the processing of this data and the risk analysis for the security measures used by our Company.

At present, we use proven high-level preventive protection measures, mechanisms for monitoring processing methods and transfers as well as accessing mechanisms on stored information, enabling us to guarantee that data processing is carried out not only in accordance with the law,

but also in accordance with the best practices in the field of data security and information systems.

Currently, the data which remains as part of our collection is not transferred outside the European Economic Area (EU). We would like to assure you that if such a transfer is to take place, we will immediately inform you about this fact and post information regarding this on the website as well as in these terms and conditions.

CATEGORIES OF COLLECTED PERSONAL DATA

Please be advised that in relations to the activities currently carried out by Our Company, we process (or may process) the following categories of your personal data:

- **Patients data,**

We process this data in order to provide services related to treatment processes (e.g. diagnosis, selection of medicines, examinations and treatments) and the implementation of dedicated medical services (include benefits such as post-discharge and provision of telemedicine services), under the law: Act on medical activities, Act on the professions of doctors and dentists; or on the basis of an agreement concluded with commercial (private) patients, for a maximum period of 30 years. In all cases, we make every effort to provide you with the highest possible level of service. This data can be processed in accordance with the Act on Patient Rights and the Ombudsman of Patient Rights, for a maximum of 30 years, depending on the course of treatment.

- **Personal data of Company employees**

We process this data in order to comply with legal obligations such as the Labour Code, constituting the basis for the processing of data by our Company within the required period of up to 50 years. By obtaining the appropriate consent, the Company may also make use of the employees' image in order to promote its services. As a result of ensuring the safety of people as well as the property of employees, this data can also be processed as part of on-going monitoring: video, telephone calls, entrusted equipment (IT systems) both during the employment relationship as well as for pursuing of claims after the termination of this relationship.

- **Application data of work candidates**

In order to conduct the recruitment procedure we process the data on the basis of your consent provided on the application document for a period of 5 years. This commences from the moment that we obtain such documents.

- **Personal data of contractors and cooperating entities**

We process this data in order to provide high quality services to Our clients (patients), based on an agreement and in accordance with the scope of activities specified within it. Personal data contractors and cooperating entities are processed in accordance with the law (e.g. under the Accounting Act) for a period of 5 years, and consequently in order to defend claims (including the limitation of claims) for administrative, civil, criminal and court proceedings.

- **The data of persons interested in cooperating with our Company**

We process this data in order to establish cooperation with new clients, at the request of entities interested in our offer and only for the duration of negotiations and trade talks. We only store this data with your consent and within the scope which you have specified.

- **Personal data of persons present on video monitoring**

As a result of providing both you and our property with security, our facilities are protected by video surveillance. We process such data solely for the purpose of defending claims, for the protection of people, the safety of our property, guests, patients and employees, and are processed in accordance with the law as to the period of limitation of claims or until the completion of any civil, administrative, enforcement and criminal proceedings.

- **Data of victims**

We obtain this data on the basis of written requests in the form of: complaints and grievances. We process this data only to service your claims of suffered damages and only for a period related to handling requests in accordance with the Administrative Procedure Code as well as for the period of limitation of claims and until the completion of administrative, civil, enforcement, criminal and court proceedings, depending on the nature of the lodged complaint.

- **Data of people who have given consent for marketing purposes**

We only process this data if you have given consent to do so. We can process this data to assess the effectiveness of services provided by us in relation to medical services (which include check-ups, monitoring and reporting) and in order to provide you with commercial information on available services in the field of after-treatment care, outpatient health care services and other benefits offered by this range. We process this data through media specified in the consent (providing services electronically, by email and by phone) up until the time you revoke your consent.

- **Personal data of animal owners**

We process this data in order to provide services related to the process of treating animals as well as for carrying out the necessary assessments. We store this data for a period of 5 years from the end of the service.

- **Other data entrusted to us in order to implement cooperation agreements**

Our resources also include personal data of which our company is not a data administrator, however, as sub-contractors we carry out various tasks related to the performance of our obligations and agreements, e.g. summer internship and sub-contracting in the implementation of grants for the National Centre for Research and Development. We process this data for the duration of the agreements and to defend claims for civil, administrative, criminal and court proceedings.

Personal data may be transferred to the following categories of recipients:

- a) cooperating entities in the provision of medical services,
- b) entities providing services to the Company in the scope of maintenance and servicing of equipment,
- c) entities providing legal services,
- d) entities authorised under law,
- e) other entities providing the Company with services necessary to achieve the objectives indicated above.

As Data Administrator, we make every effort to ensure that your data range is correct, up to date and is at a necessary minimum level needed to achieve the Company's objectives.

RIGHTS OF INDIVIDUALS WITH REGARD TO PERSONAL DATA

At every stage of data processing by the Company, the data Owner has the right to:

- access to their data, including obtaining information on the scope of data being processed by our Company as well as obtaining a copy of such data,
- modify and correct their data, and if there are no other legal contraindications to limit its scope of processing, to;
- completely delete their data (the so-called "right to be forgotten"), if there are no other legal contraindications to the implementation of this right;
- not to be subject to an automated decision-making process, including decisions based on profiling;
- to raise objections related to improperly processed personal data (including revoking consent);
- to transfer the data to another Data Administrator, if the data is processed in regards to the granted consent or concluded agreement.

In order to ensure correct handling of requests in regards to the owner's rights, the Company has adopted a form with which the data Owner can request to implement the rights listed above. You can obtain the request application in the terms and conditions tab as a link to the document from our website at <https://ahop.pl>. In order to facilitate the correct completion of your request application, including the possibility of processing your request faster, we have provided instructions on how to complete the request application (also available as a link to the document).

Completed request applications should be submitted either personally at the registered office of the Company, via traditional mail to the address of the registered office of the Company or by means of email to the following address: sekretariat@ahop.pl. Please send the request application with an electronic signature or by scanning the document with a handwritten signature. Otherwise, your application may not be considered.

Each application submitted by you is considered individual and in relation to the applicable provisions of law. As a reminder, the ability to implement a particular right may depend on the legal basis used for the specific purpose for which your data is processed in particular, whether the processing of data is not conditional on the performance of the agreement or service.

We would like to assure you that as the Data Administrator, we make every effort to ensure that your request applications are implemented without undue delay. The

maximum deadline for processing the request application is one month from the receipt of the application, however, due to the nature of the application, there may be a possibility of not meeting such deadline. In such case the applicant will be notified of the delay with the reasons related to it. In the event that we will not be able to accept and process your request application, you will also be notified.

The first request application submitted by you is processed free of charge. In the event that submitted request applications are unreasonable or excessive, we reserve the right to charge for having to provide such information again. We would like to assure you that in such case you will be informed about the reasons and the amount of fees related to the request.

We would also like to let you know that in order for us to provide you with an adequate level of security regarding the information provided in such case where we are unable to properly identify and authorise you to receive data, we reserve the right to change the manner in which we provide you with the information. You will also be informed about this fact.

In the case of the right to transfer data, as the Data Administrator, we will transfer your data directly to the Administrator indicated in your application in the event that it will be technically possible to provide such data. If this may not be possible, we will inform you of this decision.

ADDITIONAL INFORMATION

You have the right to lodge a complaint if you have grounds to believe that we do not process your personal data in the proper manner. A complaint may be submitted to the supervisory body which deals with the protection of personal data. In the Republic of Poland, the supervisory body is the Inspector for Personal Data Protection Office (PUODO).

This Policy has been in effect since 25 May 2018 to appeal and fulfils the legal obligation under Article 13 – 14 GDPR.

In order to continuously improve your services and respect your rights and privacy, we reserve the right the right to make changes to this Policy.