# PRIVACY POLICY OF AUDIO RECORDS OF "EGLĖS SANATORIJA" AB

"Eglės sanatorija" AB (hereinafter – Medical SPA or We) is taking care to protect Your privacy. We adhere to the Regulation (EU) 2016/679 of 27 April 2016 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 (General Data Protection Regulation) (hereinafter – GDPR) and other legislation that protects Your information.

This privacy policy will provide information regarding how we collect, use, and store the information about You when we record phone calls with You when You contact the Medical SPA. If you have any questions or any section of this privacy policy is not clear, reach us out via this contact info:

"Eglės sanatorija" AB

Company registration number: 152038626

Address: Eglės g. 1, Druskininkai

Tel.: +370 313 60221

E-mail: office@sanatorija.lt

https://sanatorija.lt/

### Data protection officer appointed by the Medical SPA

Tomas Revuckas IT specialist

Address: Eglės g. 1, Druskininkai

Tel.: +370 694 87 785 E-mai: <u>dap@sanatorija.lt</u>

Data protection officer shall provide information about the processing of personal data in the Medical SPA.

## Who processes Your data?

We inform you that when you make a phone call to the Medical SPA, you will be notified that the call will be recorded. The audio recording of the conversation and Your personal data will be collected and processed under the provisions of GDPR and in performance of the legal obligations by *Data controller* "Eglės sanatorija" AB (registration number of a legal person 152038626, address Eglės g. 1, Druskininkai, tel. (8 313) 60220, e-mail address office@sanatorija.lt).

#### Which, for what purpose, and on which legal grounds Your personal data is processed?

We inform you that the phone conversation recordings of the Medical SPA are processed for the purposes of assessing the quality of our services and dispute negotiation. Our collecting of information about You is lawful since the phone conversation is recorded with Your consent (GDPR Article (6)(1)(a)). If you object, all the information about the activities of the Medical SPA or other questions can be answered in the Medical SPA in person or by submitting an enquiry via e-mail.

For that purpose, the Medical SPA will process the following data of Yours: phone conversation recording, date and time of the conversation.

No information about You is collected from other sources.

You do not have to provide us with any information for this purpose.

No sensitive information about You is collected and we ask you to not provide us with such information. If You were to provide us with such information, we shall deem that You have consented to our processing of such personal data. If the provision of sensitive data is necessary due to lodging

a complaint or making a request or an enquiry, this information will be stored in accordance with law obligation.

### For how long do we store Your data?

Audio recording data is stored for 180 days.

### To whom may we transfer Your data?

We inform You that the audio recordings are stored by the data processor "Telia Lietuva", with which we have entered into a data processing contract.

We may provide access to Your personal data to the Medical SPA owners, the employees that are responsible for sales management, IT, server, archiving, and legal questions, and department managers, but obligating these service providers or employees to ensure data confidentiality and proper protection.

For the purposes of dispute negotiation, audio recordings of You may be transferred to law enforcement authorities, external service providers, e.g., lawyers, IT service providers and other subjects offering similar services, state authorities, or private enterprises conducting audits or inspections.

Do we transfer information about You beyond the boundaries of the European Economic Area?

The information about You is not transferred beyond the boundaries of the European Economic Area.

## What rights do You have?

We inform that You, as a data subject, under the legal acts of data protection and if You were to submit a written *request*, may exercise these rights of a data subject:

- 1. The right to access the information about data processing;
- 2. The right to access the data;
- 3. The right to rectification or having incomplete data completed;
- 4. The right to erasure ("right to be forgotten") or to suspend the processing activities (except storing);
- 5. The right to limit the processing;
- 6. The right to data portability;
- 7. The right to object the data processing;
- 8. The right to lodge a complaint with the State Data Protection Inspectorate.

You can find more information regarding the exercise of Your rights on Procedures for the Exercise of the Rights of the Data Subjects.

#### If You have any questions, please contact-

The data protection officer appointed by the Medical SPA, whose contact info has been given.

To access the relevant information about the processing of Your personal data, please regularly read this privacy policy.