

PRIVACY POLICY OF LOYALTY PROGRAMME AND MARKETING 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 answer the most important questions about how we collect, use, and store the information about You when you agree to participate in the loyalty programme of the Medical SPA or when you consent to the processing of Your data for the purposes of direct marketing. 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-mail: dap@sanatorija.lt

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

Who processes Your data?

We inform you that if you consent to the processing of Your data for the purposes of implementing the loyalty programme of the Medical SPA or for the purposes of direct marketing, further on *Data controller* "Eglės sanatorija" AB (registration number of a legal person 152038626, address Eglės g. 1, Druskininkai, tel. (8 313) 60222, e-mail address info@sanatorija.lt) (hereinafter – Medical SPA or We), in adherence to the provisions of GDPR and in exercise of the legal obligations prescribed in the law.

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

On the grounds of your voluntarily given consent (GDPR Article (6)(1)(a)), the Medical SPA will process the following *data provided by You*:

- -For the purposes of implementing the Medical SPA loyalty programme: name, surname, e-mail address, telephone number, date(s) of visits at the Medical SPA, services provided (accommodation/healthcare services/wellness);
- For the purposes of direct marketing:
 - For the purposes of sending You a newsletter and information about the enterprise: name, surname, e-mail address;

- For the purposes of acquiring your opinion about the quality of the services received – data subject’s age, sex, social status, the assessment of receptionists’, medical staff, physicians’ work, assessment of how the information about the disease and further treatment is given, the level of satisfaction with the services received, data on whether the patient would recommend the services to their relatives.

- No sensitive about You is processed for these purposes.

To whom may we transfer Your data?

The information about You may be transferred to:

- the State authorities inasmuch as it is required by law or applicable legal duties.
- external service providers, e.g., persons providing IT, legal, or similar services and other similar service providers;
- 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.

For how long do we store Your data?

We inform You that data about You shall be stored:

- For the purposes of implementing the Medical SPA loyalty programme – 5 years;
- For the purposes of sending a newsletter and information about the enterprise – until the patient shall unsubscribe to the newsletter;
- For the purposes of acquiring Your opinion on the services provided and their quality assessment – 2 years.

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.