

PATIENT PRIVACY POLICY OF "EGLÈS SANATORIJA" AB

"Eglès 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.

Since we are a healthcare institution, this privacy policy shall deem every client as a patient and it shall answer the essential questions on how we collect, use, and store information about You. If you have any questions or any section of this privacy policy is not clear, reach us out via this contact info:

"Eglès sanatorija" AB

Company registration number: 152038626

Address: Eglès 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: Eglès 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 attempt to contact us to receive our services (healthcare, accomodation, and other our services), further on Data controller "Eglès sanatorija" AB (registration number of a legal person 152038626, address Eglès 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 by performing the legal obligations prescribed in the law.

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

Our collecting of Your personal data is lawful based on these grounds:

- In effort to enter into a service provision contract for the services that we provide or in effort to exercise a service provision contract that is already concluded with us (GDPR Article (6)(1)(b)),
- In performance of our legal obligations (GDPR Article (6)(1)(c)),
- On the grounds of your voluntarily given consent (GDPR Article (6)(1)(a)),
- In effort to ensure our legitimate interests and after assessing that Your interests and fundamental freedoms and rights as a data subject do not override our interests (GDPR Article (6)(1)(f)), (GDPR Article (6)(1)(f)).

We inform you that on the grounds of performing the concluded service provision contract, the Medical SPA will process the following data submitted by You:

- For the purposes of service reservation/registration/accommodation of patients when they freely arrive at the Medical SPA: name, surname, date of birth, personal code (temporarily), city of

residence, telephone number, e-mail, voucher IDs, type of room, dates of arrival, type of programme, price of services, data about the being tested/untested for COVID-19;

- For the purposes of service reservation/registration/accommodation of patients when they are referred here by the physician: name, surname, date of birth, personal code, address of residence, diagnosis, service code, type of rehabilitation, duration of rehabilitation, physician and the institution of referral, contact info of a relative: name, surname, telephone number, data about the being tested/untested for COVID-19;
- For the purposes of reserving the services (treatments) via the internet website of the Enterprise: name, surname, e-mail address, telephone number, payment card data;
- For the purposes of making patients familiar with the internal rules of procedure of the enterprise when providing healthcare services: name, surname, date of birth, address, e-mail, signature;
- For the purposes of providing healthcare services, i.e. Providing physician consultations to patients: name, surname, date of birth, personal code, address, telephone number, e-mail address, disease history, diagnosis, examinations performed and their results, data of relatives who shall receive health data, if a consultation is remote – an auxiliary identification code;
- For the purposes of prescribing healthcare services (treatments) to patients: name, surname, bar code, room number, information about the prescribed procedures, voucher number, the duration, procedure programme, diagnosis, the data on physician visits: date, time, physician's seal number, name and surname, signature, blood pressure test results;
- For the purposes of prescribing and doing healthcare services (tests (urine, blood)): name, surname, date of birth, tests, test results;
- For the purposes of prescribing healthcare services (prescribing medicine) to patients: name, surname, room number, date of birth, e-mail address, procedures, appointments, nursery plan;
- For the purposes of transporting patients to and out of the Medical SPA: name, surname, contact telephone number.

We inform you that the Medical SPA, in implementation of its **legal obligations**, processes the following *personal data* of the employees:

- For the purposes of investigation of the patient complaints against patient rights infringements: data subject's name, surname, date of birth, address, telephone number, e-mail address, data of a representative and grounds for representation, contents of a complaint;
- For the purposes of giving emergency aid (processing is necessary in order to protect the vital interests of the person (GDPR Article (6) (1)(d)): name, surname, date of birth, personal code, disease history, diagnosis, tests performed and their results;

We inform you that on the basis of your freely given **consent** we will process the following data *that shall be 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);
- For the purposes of direct marketing:
 - For the purposes of sending the clients a newsletter and information about the enterprise: name, surname, e-mail address;
 - For the purposes of acquiring the patients' opinion on the services provided and their quality assessment: patient'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.
- For the purposes of recording the books issued to patients: patient's bracelet code, name, surname, telephone number, e-mail address, room number;

- For the purposes of patient registration/log-in on the Medical SPA internet website: name, surname. E-mail address, password, social media accounts (“Facebook”, “Linkedin”, “Google”, “Vkontakte”) (whichever the patient chooses at the registration);
- For the purposes of patient registration on the mobile app of the Medical SPA: name, surname, e-mail address, password, client number, room number, bracelet number, bar code, telephone number, client photograph (if uploaded by themselves), data on procedures: name, time, location, time of presence at the Medical SPA, name of a treatment programme, physician’s name, surname.

To ensure its legitimate interests, the Medical SPA shall process the imagery with You (To ensure the safety of the employees, clients, and the safety of employee and client belongings, the area of the Medical SPA is surveyed by cameras) and audio recordings containing Your voice (for the purposes of service quality assessment and dispute negotiation, the Medical SPA records phone calls).

We inform you that We collect sensitive data about You, that is the data about Your health (GDPR Article (6)(1)(b), Article (9)(2)(h)).

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 recording the books issued to patients – before the provision of specific service is terminated.
- For the purposes of transporting patients to and out of the Medical SPA – for 10 years.
- Video surveillance data is stored for 14 days;
- Audio recording data is stored for 180 days,;
- For the purposes of implementing the Medical SPA loyalty programme – 5 years;
- For the purposes of sending the clients a newsletter and information about the enterprise – until the patient shall unsubscribe to the newsletter;
- For the purposes of acquiring the patients’ opinion on the services provided and their quality assessment – 2 years.

All the other information about You is stored in accordance with the Index of Time Limits for Storage of General Documents, approved by the Chief Archivist of Lithuania, as well as storage limits for medical records laid down by the legal acts of the Republic of Lithuania (orders of the Health Minister of the Republic of Lithuania regulating the activity accounting of the healthcare institutions and accountability procedures, etc.) or with the limitation period applicable to the respective legal relationship, whichever is longer.

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.
