

## DOCUMENTATION FOR DIAGNOSTIC TESTING

**RADIO DENTAL EXTRA Korlátolt Felelősségű Társaság** (seat: Hungary, 1164 Budapest, Cinkotakert utca 5/2., site: Hungary, 1082 Budapest, Üllői út 2-4. földszint; statistical code: 24797410-8690-113-01; company registration number: 01-09-182921) as service provider – hereinafter: “Provider” – is a healthcare provider under Act CLIV of 1997 on Health (hereinafter: “Health Act”) entitled to provide health services (Outpatient Care / Diagnostics / Other Care / Telemedicine and application of radiology procedures / Ultrasonography) – hereinafter: “health services” – on its own behalf, and to that end operates a 3D CBCT and X-Ray Centre at its site.

### Information by the Provider:

Provider informs the Client separately about the following information related to the tasks of health workers:

Health workers provide healthcare with the care normally required in the given situation, within the limits of their professional requirements, in compliance with ethical rules, according to their best knowledge and conscience, at the level of material and personal conditions at their disposal, in accordance with their professional competence. Healthcare workers – unless doing so adversely affects the health of the patient, and while directing the patient to another physician – may refuse to fulfil a medical task if it contradicts their moral judgment, conscience or religious beliefs.

Provider informs the Client separately about the following information related to health services and the application of radiological procedures:

When carrying out a medical task, radiological procedures may only be used in cases, and only to the extent, where professionally justified and in the interest of the person receiving the exposure, provided that the risk associated with the application is less than the risk of non-application, and that the results expected from radiation exposure are not achievable through other available medical procedures not involving radiation exposure. In order to substantiate the justification of a radiological procedure, the professional association issues a letter on methodology to the referring physicians about the professional requirements of the application, including the estimated patient doses. When applying a radiological procedure, in order to optimize the radiation exposure and to substantiate the justification, the referring physician and the treating physician shall arrange for the acquisition of prior diagnostic data relevant to the application of the intended procedure and, if necessary, ensure their delivery. The referring and the treating physician shall work together to determine whether the radiological procedure is justified. The treating physician is responsible for all medical applications of radiological procedures. The treating physician may delegate the implementation of the procedure or a part thereof to a qualified healthcare worker. The responsibility of the treating physician for the application of radiological procedures shall include: (a) the justification of the procedure; (b) the optimization of radiation exposure; (c) the clinical evaluation of diagnostic results; (d) practical cooperation with other experts and health professionals, where appropriate; (e) to obtain, where possible, data and other information from previous examinations; (f) the provision of available data and other information to the clinician or other treating physician referred to in this regulation and in accordance with specific legislation; (g) the provision of information to patients and persons involved in the examination on the risks of ionizing radiation under specific legislation.

Given the above, Provider shall perform health services on the basis of the medical referrals it receives. In the absence of a referral, Provider will only provide health services if the patient declares in writing that he/she believes that the medical condition justifies immediate care and that a visit to the physician authorized to issue a referral would significantly delay his/her treatment. In this context, Provider may not be held liable for any damage resulting from unreasonable use of the health service.

Provider informs the Client separately about the following special information related to the application of radiological procedures:

In X-ray examinations, imaging is done using ionizing radiation, which can have a detrimental effect on living organisms. However, in case of appropriate indication, the information expected from the test is more useful for the Client's health than the risk of exposure. In order to minimize radiation exposure, Provider places great emphasis on radiation protection for clients and workers as required by law. Dental and dental surgery radiology has a well-defined scope of indication. Its purpose is to produce the most appropriate diagnostic image quality to minimize Client exposure. The most common are intraoral X-rays ("minor X-ray") and panoramic X-ray imaging that provide an overview of the patient's dental status, or possibly the so-called "full status" required for periodontal treatments, but with greater radiation exposure. The next level constitutes of radiography that may be requested as supplementary information, including occlusal ("wing-bite") X-ray, transverse layer imagery (some panoramic X-ray equipment may have such additional recording capability), cephalometric projection, occasionally arch radiography, posteroanterior sinus radiography, etc., and "cone beam CT imagery", also known as digital volume tomography. Or, based on appropriate indication, CT or MR imagery. The advantages of CT scans that were previously dominant in three-dimensional X-ray diagnostics are well known; the only limit of its application is the high radiation exposure associated with the test. The above X-ray examinations do not require preparations at home, you may eat and drinking beforehand and should take your regular medications. We will ask you to remove all metallic accessories (necklace, earrings, watches, etc.) right before the examination.

Ultrasonographies are gentle and painless procedures that use sound waves to for the medical imaging of the body in 3 dimensions, in that way the examinations are used to assess internal medicine, endocrinology, urology, gynecology, joint and vascular problems. The procedure does not require invasive intervention, the ultrasound waves are directed to the body by using a probe of which are capable of imaging with the waves reflected from the body. Food should not be consumed six (6) hours prior to abdominal and pelvic ultrasound, it is recommended to consume only non-carbonated (still) water for fluid intake and fluid replacement. A pelvic ultrasound examination requires a full bladder, do not urinate one or two (1-2) hours before the examination, a little more water to drink is recommended.

Client Declarations:

*If you have a referral:*

1. By signing this document, I, the undersigned Client, hereby declare that I have been fully informed by the Provider:
  - on patients' rights and the options of enforcing them, as well as the Provider's house rules;
  - that I am obliged to observe the relevant legislation and the Provider's operating rules when using the health service; and
  - that I am obliged to pay the fee set by the Provider.
2. I, the undersigned Client, being aware of the information provided to me, ask you to carry out the diagnostic test specified in the referral issued to me and handed over to the Provider.
3. I acknowledge that the test is considered an invasive intervention (physical intervention through the skin, mucous membrane or bodily orifice of the patient, not including interventions that are of professionally negligible risk to the patient, as well as ultrasonography), to which I give my consent by signing this declaration.
4. Finally, I declare that I have familiarized myself with and acknowledge the provisions of the Provider's Privacy Policy, and by signing this declaration, pursuant to the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and Act XLVII of 1997 on the Protection and Processing of Medical and Other Related Data, I give my written consent to the Provider to process and transmit, for its intended purposes, my personal data and sensitive personal data recorded. The consent I have given by signing this declaration does not include my consent to Provider sending SMS messages for marketing purposes to the phone number I have specified. I do not consent to the sending of SMS messages by the Provider for marketing purposes to the telephone number I have provided.

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Signature

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Name

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Date

*If you do not have a referral:*

1. By signing this document, I, the undersigned Client, hereby declare that I have been fully informed by the Provider:
  - on patients' rights and the options of enforcing them, as well as the Provider's house rules;
  - that I am obliged to observe the relevant legislation and the Provider's operating rules when using the health service; and
  - that I am obliged to pay the fee set by the Provider.
  
2. I, the undersigned Client, being aware of the information provided to me, ask you to carry out the diagnostic test on me even without a referral issued to me as I believe that my medical condition justifies immediate care and that a visit to the physician authorized to issue a referral would significantly delay my treatment! I have understood the content of this document regarding the lack of referral and acknowledge that I shall bear the risks arising from procuring health services without a referral.
  
3. I acknowledge that the test is considered an invasive intervention (physical intervention through the skin, mucous membrane or bodily orifice of the patient, not including interventions that are of professionally negligible risk to the patient, as well as ultrasonography), to which I give my consent by signing this declaration.
  
4. Finally, I declare that I have familiarized myself with and acknowledge the provisions of the Provider's Privacy Policy, and by signing this declaration, pursuant to the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and Act XLVII of 1997 on the Protection and Processing of Medical and Other Related Data, I give my written consent to the Provider to process and transmit, for its intended purposes, my personal data and sensitive personal data recorded. The consent I have given by signing this declaration does not include my consent to Provider sending SMS messages for marketing purposes to the phone number I have specified. I do not consent to the sending of SMS messages by the Provider for marketing purposes to the telephone number I have provided.

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Signature

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Name

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Date

**PRIVACY POLICY OF  
RADIO DENTAL EXTRA KFT.**

**I. Data processing related to the provision of health services**

**1. General provisions**

- 1.1 This contents of this present Section (I) of the privacy policy cover the rules of data control, processing and transmission regarding the personal data and sensitive data of the recipient – hereinafter: “Data Subject” – of dental imaging diagnostic services – hereinafter: “Services” – provided by **Radio Dental Extra Kft** (registered seat: Hungary, 1164 Budapest, Tátraszirt sor 1. B. ép. 1. e. 3.; company registration number: 01-09-182921; tax number: 24797410-2-42; represented by: Istvánné IZSÓ, Managing Director), hereinafter: “Controller”. Data processing under this policy shall be conducted on grounds of the legal relationship deriving from the rendering of Services between Controller and Data Subject, as well as on grounds of the legal relationship between Controller and the physician issuing the referral to Data Subject (whereby Controller provides the Services to Data Subject as a third party). In both cases, given that a client relationship is established between Data Subject and Controller, the cornerstones of data processing shall be identical and are defined in this privacy policy.
- 1.2 The legal basis for data processing shall be the written consent given by Data Subject in accordance with the provisions of Act CXII of 2011 (hereinafter: “Privacy Act”), with the condition in accordance with Act XLVII of 1997 on the Protection and Processing of Medical and Other Related Data (hereinafter: “Health Privacy Act”) that Data Subject’s consent, unless proved otherwise, shall be deemed to have been given if Data Subject contacted Controller voluntarily. Consent may be provided through the appropriate use of the IT tool suitable for digitizing the image of signatures in the institution operated by Controller.
- 1.3 The contents of this present Section (I) of the privacy policy serve to fulfil the obligations laid down in Subsections 20(1)-(2) of the Privacy Act by providing full disclosure to Data Subject on all matters indicated therein with regard to data processing.
- 1.4 Data processing shall cover the following data (hereinafter: “Data”) concerning the Data Subject:
- name;
  - place and date of birth;
  - nationality;
  - home address;
  - mother’s birth name;
  - social security number;
  - electronic mailing address;
  - phone number.
- 1.5 The duration for which the Data are to be processed, under this section, shall be until Data Subject requests the erasure of their personal data and requests that such processing be terminated. In the event

that Data Subject withdraws his or her consent to data processing, Controller shall cease data processing immediately following such withdrawal of consent.

- I.6. The purpose of data processing under Section (I) herein, in view of Subsection 4(1) of the Health Privacy Act, is to enable Controller to provide the Services to Data Subject at the highest possible quality.
- I.7. Controller and natural persons employed by or engaged in other work-related relationship with Controller, as well as any partners of Controller involved in the rendering of the Services, shall be entitled to conduct the data control described under this present Section (I) and the data processing conducted on that basis. The persons specified in this Subsection (1.7.) shall be entitled to obtain the data provided by Data Subject to Controller.
- I.8. With regard to definitions concerning data processing, the definitions specified in the Privacy Act shall prevail, with the proviso that in case a definition specified in the Health Privacy Act differs from that in the Privacy Act, the former shall prevail.
- I.9. Controller provides the option of online booking at its website at [www.radiodental.hu](http://www.radiodental.hu) (hereinafter: "Website"). When you click on the "Online Booking for Clients" menu item on the Website, you agree that the webmaster of the website at [www.booked4.us](http://www.booked4.us) organizing the booking will transmit the data provided by Data Subject at the time of the reservation to the Controller and for Controller to access such data, and to send an electronic notification to the e-mail address provided by the Data Subject at the time of the reservation; furthermore, that Controller send information to Data Subject in the form of an SMS message about the date booked by Data Subject on the basis of the data thus transmitted to Controller.

## **2. Means of data processing**

21. By providing a signature via the device specified in Subsection 1.2, Data Subject consents to Controller collecting, processing and transmitting the personal data for the purposes and to the extent and through the means stipulated in this present Section (I) of this policy. Data provision shall be voluntary in all cases.
22. Controller shall process Data Subject's data for the purposes of rendering the Services, for fulfilling his obligations arising from the business activities conducted, only to the extent and for the duration necessary to achieve its purpose as defined in Subsection 4(2) of the Privacy Act. Data processing in all its stages shall comply with those purposes. Data Controller shall in no way misuse the Data disclosed to him as part of his data processing activities.
23. Controller shall only transmit personal data processed by him to a third party, in particular to the physician referring Data Subject – through a referral – to Controller, if this is in the interest of Data Subject. By providing a signature via the device indicated in Article 1.2, Data Subject expressly agrees that if the contractual relationship between Data Subject and Controller was based on a referral, any personal and sensitive data created, accumulated or disclosed to Controller in the course of rendering the Services – in view of Subsections(2)-(4) of the Health Privacy Act – will be transmitted. Controller shall in all cases keep a record of the data transmission – in accordance with the provisions of Subsection

15(2) of the Privacy Act and Subsection 28(1) of the Health Privacy Act – which shall include the date of transmission of the data relating to Data Subject, the legal basis for the transfer of data (under this present Article 2.3), the recipient, the method of transmission and the scope of the data transmitted, with all such information being retained for the period specified in the legislation prescribing data processing, but at least for a period of five (5) years.

24. Personal data processed by Controller shall not be used for the purposes of a third party and shall not be misused in any way by Controller.
25. Data must be protected by Controller through means of suitable measures, in particular against unauthorized access, damage, alteration, transmission, public disclosure, deletion or destruction, as well as accidental loss or injury, and to ensure that stored data cannot be rendered inaccessible.

### 3. Data Subject's options regarding data processing

- 3.1. Data Subject has the right to request information from Controller on the processing of his or her personal and sensitive data, as well as the rectification, erasure or blocking of such data, while maintaining the identifiability of the data originally collected, via the following means:
  - by postal mail:
  - by e-mail:
- 3.2. Upon Data Subject's request, Controller shall provide information concerning the Data processed by Controller, the sources from where they were obtained, the purpose, grounds and duration of processing, and the legal basis of data transmission and the recipients. Controller must comply with requests for information without any delay (after having received such a request), and provide the above information in an intelligible form, in writing within not more than twenty-five (25) days. Controller may refuse to provide information only in the cases defined under Subsection 9(1) of and under Section 19 of the Privacy Act. Should a request for information be denied, Controller shall inform Data Subject in writing as to the provision of the Privacy Act serving grounds for refusal. Where information is refused, Controller shall inform Data Subject on the possibilities for seeking judicial remedy or lodging a complaint with the National Authority for Data Protection and Freedom of Information (*Nemzeti Adatvédelmi és Információszabadság Hatóság*).
- 3.3. Controller shall rectify personal and sensitive data where it is deemed inaccurate, and where the correct personal data is at Controller's disposal.
- 3.4. Personal data shall be erased: if processed unlawfully; if so requested by Data Subject; if the processed data is incomplete or inaccurate and it cannot be lawfully rectified, provided that erasure is not disallowed by statutory provision of an act; if the purpose of processing no longer exists or the legal time limit for storage has expired, or; if so ordered by court or by the National Authority for Data Protection and Freedom of Information.
- 3.5. Personal data shall be blocked if so requested by Data Subject, or if there are reasonable grounds to believe that erasure could affect the legitimate interests of Data Subject. Blocked personal and sensitive data shall be processed only for the duration of the purpose which prevented their erasure.

- 3.6. If the accuracy of an item of personal data is contested by Data Subject and its accuracy or inaccuracy cannot be ascertained beyond doubt, Controller shall mark that personal data.
- 3.7. Controller has twenty-five (25) days at his disposal for erasing, blocking or rectifying the personal or sensitive data. If Controller refuses to comply with Data Subject's request for rectification, blocking or erasure, the reasons for such refusal shall be communicated in writing, or by electronic means in case Data Subject had so consented, within twenty-five (25) days of receipt of the request. Where rectification, blocking or erasure is refused, Controller shall inform Data Subject of the possibilities for seeking judicial remedy or lodging a complaint with the National Authority for Data Protection and Freedom of Information.
- 3.8. When data is rectified, blocked, marked or erased, Controller shall notify Data Subject and all recipients to whom it had been transmitted for processing. Notification is not required if such an omission does not violate the rightful interest of Data Subject considering the purpose of processing.
- 3.9. Data Subject may object to the processing of his or her personal and sensitive data if the processing or transmission of personal and sensitive data is required solely to fulfil a legal obligation of Controller or to enforce a legitimate interest of the Controller, the recipient of the data or a third party, unless prescribed by law; or if the use or transmission of personal data is for direct marketing, opinion polling or scientific research; or in cases otherwise provided by law. Controller shall review the objection without any delay (after having received such a request), but not later than within fifteen (15) days and pass a decision on its legitimacy and notify Data Subject in writing. In case the objection was deemed justified, Controller shall cease data processing, including all further data recordings and transfers, and shall block the data and notify all parties about the objection and the measures taken on that basis to whom such objected data had been transferred and who are obliged to act to enforce the right to object. If Data Subject finds the decision made by Controller in response to the objection questionable, or if Controller fails to observe the above time limit, Data Subject may bring action at a court within thirty (30) days of having learned of the decision or from the last day of the time limit.
- 3.10. Data Subject may seek a ruling from a court against Controller if his/her rights have been violated, or in cases regulated in Article 3.9.

## **II. Data processing prior to the contractual relationship between the Controller and the Data Subject**

### **1. General provisions**

- 1.1 The terms, abbreviations and references used in the present Section (II) of the Privacy Policy are only applicable to this Section (II).
- 1.2 Data processing under this present Section (II) shall mean the processing of personal data of persons who are potential recipients, and thereby potential clients, of the dental imaging diagnostic services (hereinafter: "Services") provided by **Radio Dental Extra Kft.** (seat: Hungary, 1164 Budapest, Tátraszirt sor 1. B. ép. 1. em. 3., company registration number: 01-09-182921; tax number: 24797410-



2-42; represented by: Istvánné IZSÓ, Managing Director) (hereinafter: “Controller”).

- 1.3** The contents of this present Section (II) of the privacy policy serve to fulfil the obligations laid down in Subsection 20(4) of the Privacy Act.
- 1.4** The legal basis for data processing under this present Section (II) of the privacy policy shall be Paragraph 6(1)b) of the Privacy Act, considering that data processing under this present Section (II) is to enforce the legitimate interests of Controller, i.e., for the purposes of client acquisition based on adaptation to market conditions.
- 1.5** Data processing shall cover the following data (hereinafter: “Data”) concerning the Data Subject: name, phone number, email address.
- 1.6** The duration for which the Data are to be processed, under this section, shall be until Data Subject requests the erasure of their personal data and requests that such processing be terminated, or until a legal relationship and/or customer relationship is established between Controller and Data Subject with regard to the provision of the Services,
- 1.7** Controller and natural persons employed by or engaged in other work-related relationship with Controller, as well as any partners of Controller involved in the rendering of the Services, shall be entitled to conduct the data control described under this present Section (II) and the data processing conducted on that basis. The persons specified in this Subsection (1.7.) shall be entitled to obtain the data provided by Data Subject to Controller.
- 1.8** With regard to definitions concerning data processing, the definitions specified in the Privacy Act shall prevail, with the proviso that in case a definition specified in the Health Privacy Act differs from that in the Privacy Act, the former shall prevail.
- 1.9** Controller provides the option of online booking at its website at [www.radiodental.hu](http://www.radiodental.hu) (hereinafter: "Website"). When Data Subject clicks on the "Online Booking for Clients" menu item on the Website, they agree that the webmaster of the website at [www.booked4.us](http://www.booked4.us) organizing the booking will transmit the data provided by Data Subject at the time of the reservation to the Controller and for Controller to access such data, and to send an electronic notification to the e-mail address provided by the Data Subject at the time of the reservation; furthermore, that Controller send information to Data Subject in the form of an SMS message about the date booked by Data Subject on the basis of the data thus transmitted to Controller.

## **2. Means of data processing**

- 2.1.** Pursuant to Paragraph 6(1)b) of the Privacy Act, Controller is entitled to collect, process and transmit Data Subject’s data specified in Article 1.5 herein for the purposes and to the extent and through the means stipulated in this present Section (II) of the privacy policy. Data provision shall be voluntary in all cases.
- 2.2.** Controller shall process Data Subject’s data for the purposes of rendering the Services, for fulfilling his

obligations arising from the business activities conducted, only to the extent and for the duration necessary to achieve its purpose as defined in Subsection 4(2) of the Privacy Act. Data processing in all its stages shall comply with those purposes. Data Controller shall in no way misuse the Data disclosed to him as part of his data processing activities.

- 2.3. Controller shall only transmit personal data processed by him to a third party to further develop and broaden its business, and to prepare a contract with Data Subject or to establish a customer relationship, in view of Subsections 10(2)-(4) of the Health Privacy Act. Controller shall in all cases keep a record of the data transmission – in accordance with the provisions of Subsection 15(2) of the Privacy Act and Subsection 28(1) of the Health Privacy Act – which shall include the date of transmission of the data relating to Data Subject, the legal basis for the transfer of data (under this present Article 2.3), the recipient, the method of transmission and the scope of the data transmitted, with all such information being retained for the period specified in the legislation prescribing data processing, but at least for a period of five (5) years.
- 2.4. Personal data processed by Controller shall not be used for the purposes of a third party and shall not be misused in any way by Controller.
- 2.5. Data must be protected by Controller through means of suitable measures, in particular against unauthorized access, damage, alteration, transmission, public disclosure, deletion or destruction, as well as accidental loss or injury, and to ensure that stored data cannot be rendered inaccessible.

### **3. Data Subject's options regarding data processing**

- 3.1. Data Subject has the right to request information from Controller on the processing of his or her personal data, as well as the rectification, erasure or blocking of such data, while maintaining the identifiability of the data originally collected, **via the following means:**
- 3.2. Upon Data Subject's request, Controller shall provide information concerning the Data processed by Controller, the sources from where they were obtained, the purpose, grounds and duration of processing, and the legal basis of data transmission and the recipients. Controller must comply with requests for information without any delay (after having received such a request), and provide the above information in an intelligible form, in writing within not more than twenty-five (25) days. Controller may refuse to provide information only in the cases defined under Subsection 9(1) of and under Section 19 of the Privacy Act. Should a request for information be denied, Controller shall inform Data Subject in writing as to the provision of the Privacy Act serving grounds for refusal. Where information is refused, Controller shall inform Data Subject on the possibilities for seeking judicial remedy or lodging a complaint with the National Authority for Data Protection and Freedom of Information (*Nemzeti Adatvédelmi és Információszabadság Hatóság*).
- 3.3. Controller shall rectify the personal data where it is deemed inaccurate, and where the correct personal data is at Controller's disposal.
- 3.4. Personal data shall be erased: if processed unlawfully; if so requested by Data Subject; if the processed data is incomplete or inaccurate and it cannot be lawfully rectified, provided that erasure is not

disallowed by statutory provision of an act; if the purpose of processing no longer exists or the legal time limit for storage has expired, or; if so ordered by court or by the National Authority for Data Protection and Freedom of Information.

- 3.5. Personal data shall be blocked if so requested by Data Subject, or if there are reasonable grounds to believe that erasure could affect the legitimate interests of Data Subject. Blocked personal and sensitive data shall be processed only for the duration of the purpose which prevented their erasure.
- 3.6. If the accuracy of an item of personal data is contested by Data Subject and its accuracy or inaccuracy cannot be ascertained beyond doubt, Controller shall mark that personal data.
- 3.7. Controller has twenty-five (25) days at his disposal for erasing, blocking or rectifying the personal or sensitive data. If Controller refuses to comply with Data Subject's request for rectification, blocking or erasure, the reasons for such refusal shall be communicated in writing, or by electronic means in case Data Subject had so consented, within twenty-five (25) days of receipt of the request. Where rectification, blocking or erasure is refused, Controller shall inform Data Subject of the possibilities for seeking judicial remedy or lodging a complaint with the National Authority for Data Protection and Freedom of Information.
- 3.8. When data is rectified, blocked, marked or erased, Controller shall notify Data Subject and all recipients to whom it had been transmitted for processing. Notification is not required if such an omission does not violate the rightful interest of Data Subject considering the purpose of processing.
- 3.9. Data Subject may object to the processing of his or her personal and sensitive data if the processing or transmission of personal and sensitive data is required solely to fulfil a legal obligation of Controller or to enforce a legitimate interest of the Controller, the recipient of the data or a third party, unless prescribed by law; or if the use or transmission of personal data is for direct marketing, opinion polling or scientific research; or in cases otherwise provided by law. Controller shall review the objection without any delay (after having received such a request), but not later than within fifteen (15) days and pass a decision on its legitimacy and notify Data Subject in writing. In case the objection was deemed justified, Controller shall cease data processing, including all further data recordings and transfers, and shall block the data and notify all parties about the objection and the measures taken on that basis to whom such objected data had been transferred and who are obliged to act to enforce the right to object. If Data Subject finds the decision made by Controller in response to the objection questionable, or if Controller fails to observe the above time limit, Data Subject may bring action at a court within thirty (30) days of having learned of the decision or from the last day of the time limit.
- 3.10. Data Subject may seek a ruling from a court against Controller if his/her rights have been violated, or in cases regulated in Article 3.9.

### **III. Information for physicians registering at Controller's website**

#### **1. General provisions**

- 1.1.** Data processing under this present Section (III) shall mean the processing of personal data of physicians opting to register under the option "Registration for new physicians" at the website [www.radiodental.hu](http://www.radiodental.hu) (hereinafter: "Website") managed by **Radio Dental Extra Kft.** (seat: Hungary, 1164 Budapest, Tátraszirt sor 1. B. ép. 1. em. 3., company registration number: 01-09-182921; tax number: 24797410-2-42; represented by: Istvánné IZSÓ, Managing Director) (hereinafter: "Controller").
- 1.2.** The terms, abbreviations and references used in the present Section (III) of the Privacy Policy are only applicable to this Section (III).
- 1.3.** The contents of this present Section (III) of the privacy policy serve to fulfil the obligations laid down in Subsection 20(4) of the Privacy Act.
- 1.4.** Registration number for data processing: NAIH-102029/2016.
- 1.5.** By registering as outlined in Article 1.1 and by providing the data required therein, Data Subject provides his/her consent to an associate of Controller contacting him/her at any of the contact details provided therein and to initiate a personal meeting.
- 1.6.** The consent given under this present Section (III) Article 1.5 may be withdrawn by Data Subject at any time.
- 1.7.** Data processing shall cover the following data (hereinafter: "Data") concerning the Data Subject: name, phone number, email address.
- 1.8.** The duration for which the Data are to be processed, under this section, shall be until Data Subject requests the erasure of their personal data and requests that such processing be terminated.
- 1.9.** Controller and natural persons employed by or engaged in other work-related relationship with Controller, as well as any partners of Controller involved in the rendering of the Services, shall be entitled to conduct the data control described under this present Section (III) and the data processing conducted on that basis. The persons specified in this **Subsection (1.10.)** shall be entitled to obtain the data provided by Data Subject to Controller.
- 1.10.** With regard to definitions concerning data processing, the definitions specified in the Privacy Act shall prevail.

#### **2. Means of data processing**

- 2.1.** Pursuant to Paragraph 6(1)b) of the Privacy Act, Controller is entitled to collect, process and transmit Data Subject's data specified in **Article 1.8** herein for the purposes and to the extent and through the

means stipulated in this present Section (II) of the privacy policy. Data provision shall be voluntary in all cases.

- 2.2. Controller shall process Data Subject's data for the purposes of rendering the Services, for fulfilling his obligations arising from the business activities conducted, only to the extent and for the duration necessary to achieve its purpose as defined in Subsection 4(2) of the Privacy Act. Data processing in all its stages shall comply with those purposes. Data Controller shall in no way misuse the Data disclosed to him as part of his data processing activities.
- 2.3. Controller shall only transmit personal data processed by him to a third party to further develop and broaden its business, and to prepare a contract with Data Subject or to establish a customer relationship. Controller shall in all cases keep a record of the data transmission – in accordance with the provisions of Subsection 15(2) of the Privacy Act and Subsection 28(1) of the Health Privacy Act – which shall include the date of transmission of the data relating to Data Subject, the legal basis for the transfer of data (under this present **Article 2.8**), the recipient, the method of transmission and the scope of the data transmitted, with all such information being retained for the period specified in the legislation prescribing data processing, but at least for a period of five (5) years.
- 2.4. Personal data processed by Controller shall not be used for the purposes of a third party and shall not be misused in any way by Controller.
- 2.5. Data must be protected by Controller through means of suitable measures, in particular against unauthorized access, damage, alteration, transmission, public disclosure, deletion or destruction, as well as accidental loss or injury, and to ensure that stored data cannot be rendered inaccessible.

### **3. Data Subject's options regarding data processing**

- 3.1. Data Subject has the right to request information from Controller on the processing of his or her personal data, as well as the rectification, erasure or blocking of such data, while maintaining the identifiability of the data originally collected, **via the following means**:
- 3.2. Upon Data Subject's request, Controller shall provide information concerning the Data processed by Controller, the sources from where they were obtained, the purpose, grounds and duration of processing, and the legal basis of data transmission and the recipients. Controller must comply with requests for information without any delay (after having received such a request), and provide the above information in an intelligible form, in writing within not more than twenty-five (25) days. Controller may refuse to provide information only in the cases defined under Subsection 9(1) of and under Section 19 of the Privacy Act. Should a request for information be denied, Controller shall inform Data Subject in writing as to the provision of the Privacy Act serving grounds for refusal. Where information is refused, Controller shall inform Data Subject on the possibilities for seeking judicial remedy or lodging a complaint with the National Authority for Data Protection and Freedom of Information (*Nemzeti Adatvédelmi és Információszabadság Hatóság*).
- 3.3. Controller shall rectify the personal data where it is deemed inaccurate, and where the correct personal data is at Controller's disposal.

- 3.4. Personal data shall be erased: if processed unlawfully; if so requested by Data Subject; if the processed data is incomplete or inaccurate and it cannot be lawfully rectified, provided that erasure is not disallowed by statutory provision of an act; if the purpose of processing no longer exists or the legal time limit for storage has expired, or; if so ordered by court or by the National Authority for Data Protection and Freedom of Information.
- 3.5. Personal data shall be blocked if so requested by Data Subject, or if there are reasonable grounds to believe that erasure could affect the legitimate interests of Data Subject. Blocked personal and sensitive data shall be processed only for the duration of the purpose which prevented their erasure.
- 3.6. If the accuracy of an item of personal data is contested by Data Subject and its accuracy or inaccuracy cannot be ascertained beyond doubt, Controller shall mark that personal data.
- 3.7. Controller has twenty-five (25) days at his disposal for erasing, blocking or rectifying the personal or sensitive data. If Controller refuses to comply with Data Subject's request for rectification, blocking or erasure, the reasons for such refusal shall be communicated in writing, or by electronic means in case Data Subject had so consented, within twenty-five (25) days of receipt of the request. Where rectification, blocking or erasure is refused, Controller shall inform Data Subject of the possibilities for seeking judicial remedy or lodging a complaint with the National Authority for Data Protection and Freedom of Information.
- 3.8. When data is rectified, blocked, marked or erased, Controller shall notify Data Subject and all recipients to whom it had been transmitted for processing. Notification is not required if such an omission does not violate the rightful interest of Data Subject considering the purpose of processing.
- 3.9. Data Subject may object to the processing of his or her personal data if the processing or transmission of personal data is required solely to fulfil a legal obligation of Controller or to enforce a legitimate interest of the Controller, the recipient of the data or a third party, unless prescribed by law; or if the use or transmission of personal data is for direct marketing, opinion polling or scientific research; or in cases otherwise provided by law. Controller shall review the objection without any delay (after having received such a request), but not later than within fifteen (15) days and pass a decision on its legitimacy and notify Data Subject in writing. In case the objection was deemed justified, Controller shall cease data processing, including all further data recordings and transfers, and shall block the data and notify all parties about the objection and the measures taken on that basis to whom such objected data had been transferred and who are obliged to act to enforce the right to object. If Data Subject finds the decision made by Controller in response to the objection questionable, or if Controller fails to observe the above time limit, Data Subject may bring action at a court within thirty (30) days of having learned of the decision or from the last day of the time limit.
- 3.10. Data Subject may seek a ruling from a court against Controller if his/her rights have been violated, or in cases regulated in Article 3.9.

#### **IV. Information on data processing for the purposes of marketing**

1. In respect of persons considered Data Subjects pursuant to the provisions of Chapter I, and provided

that consent was given by Data Subject, Controller shall send SMS notifications for marketing purposes, at a time specified by Controller, to the telephone number provided by Data Subject.

2. Data Subject may withdraw his/her consent as defined in Article 1 of this present Section (IV) at any time.
3. In other respects, data processing under this present Section (IV) – with the exceptions of Articles 1.4, 1.6 and 1.9 of Section (I) – shall be governed by the provisions of Section (I).
4. Data processing shall cover the following data (hereinafter: “Data”) concerning the Data Subject: phone number.
5. The purpose of data processing under this present **Section (I)** is to maintain contact with Data Subject in order to maintain a high-quality customer relationship.