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Reneva

**Information for data management  
related to the use of the website available  
under the domain name  
[www.renevamed.com](http://www.renevamed.com)**

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## 1. General information

The purpose of this information sheet is to provide data subjects with information about the processing of their personal data that may be associated with the use of the website [www.renevamed.com](http://www.renevamed.com) (hereinafter: website).

The use of the website may involve the processing of personal data in the following cases:

- Data management related to appointments and reservations
- Data management related to the exercise of data subject rights
- Data management related to the use of cookies.

The data manager does not use automated decision-making and does not perform profiling during the data processing affected by this information.

### 1.1. Data controller

With regard to the data processing detailed by this information sheet, the data controller is:

*RENEVA Medical Ltd. (hereinafter: Data Controller)*

*headquarters.: 1112 Budapest, 30-38 Mikes Kelemen utca. A/A/3/35.*

*registration no.: 01-09-410256*

*tax no.: 32172898-2-43*

*[www.renevamed.com](http://www.renevamed.com)*

### 1.2. Contact information for the purpose of exercising data subject rights

See section 3.1 for specific contact details for exercising data subject rights.

### 1.3. Legislation governing data management

The following legislation applies to the data processing affected by this information sheet:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free flow of such data and on the repeal of Directive 95/46/EC (general data protection regulation),

- Act CXII of 2011 on the right to self-determination of information and freedom of information (Act of Info) - Provisions defined in paragraph § (2) 2 of the Act of Info;

and in relation to cookies:

- Act C of 2003 on electronic communications, paragraph § (4) 155.

## **1.4. Right to a remedy**

If, in the opinion of the data subject, the Data Controller has violated the applicable data protection requirements during the processing of his personal data, he may address his complaint or request to the following:

- you can submit a complaint or request to the National Data Protection and Freedom of Information Authority (1125 Budapest, 22/C Szilágyi Erzsébet fasor; postal address: 1530 Budapest pf.: 5.; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu))
- you can go to court and file a lawsuit to protect your data; the court acts in the case out of turn [according to the choice of the lawsuit, it can also be initiated at the Metropolitan Court according to place of residence (permanent address or temporary address), or the headquarter of the Data Controller (you can find information about the court of your place of residence here: <http://birosag.hu/ugyfelkapsoklatsi-portal/birosag-kereso>)

## 2. Data management related to the use of the website

### 2.1. Data management related to appointments and reservations

#### 2.1.1. Purpose and legal basis of data management

**a)** When initiating an appointment, we use the data you provide (name, phone number, e-mail address, if applicable) to conduct a phone call initiated by us in order to make an appointment for the consultation (examination) you have selected [by filling in the form and by clicking on "sending", an e-mail containing the specified data is generated, which the doctor receives].

Data management is based on your consent [General Data Protection Regulation Article 6 (1) para. point a)]. If you do not wish to provide your data, you can initiate the appointment yourself at the phone number indicated on the website.

You give your consent by taking note of the information about data management and by sending the request of the person who initiated the appointment. For this purpose, you only enter your own personal data on the form (if someone does not enter their own personal data, it is their responsibility to obtain the consent of the person concerned)! In the case of a minor under the age of 16, only the minor's legal representative (the adult exercising parental supervision) can provide the data and consent to data management.

You can withdraw your consent to data processing for this purpose at any time during data processing. You can notify us about your intention at the contact details indicated in section 3.1 below.

**b)** If you make an appointment for a specific appointment, in that case your data [name, telephone number, pre-booked appointment (examination) date, as well as the selected doctor] will be processed in order to provide the service you have requested, the data management is necessary to take preventive steps and maintain contact [General Data Protection Regulation Article 6 (1) para. point b)].

#### 2.1.2. Duration of data management

We will process the data provided to initiate the appointment [2.1.1.a)] until the actual appointment is made or until the consent is withdrawn, and the data recorded at the time of appointment [2.1.1.b)] until the appointment expires or the appointment is canceled, but we will process it no longer than

the following 30 days, after which we will delete the appointments from our registration system.

### **2.1.3. Recipients of personal data and categories of recipients**

In addition to the Data Controller, the data recorded in the appointment can be viewed by a doctor or other person who personally contributes to the health care provider performing the specific order or receives notification thereof.

For the operation of the website, as well as for the operation and storage of the e-mail accounts used for the e-mail traffic related to reservations, the Data Controller uses an external service provider who is also a data processor for e-mails. The data of the data processor are as follows:

*booked4.us Ltd.*

*headquarter.: H-2600 Vác, 12 Zichy H. utca*

*registration no.: 13-09-198371*

*tax no.: 26668901-2-13*

*[www.booked4.us](http://www.booked4.us)*

## **2.2. Data management related to the exercise of data subject rights**

### **2.2.1. Purpose and legal basis of data management**

**a)** The Data Controller processes certain personal data - basically those provided by the data subject - for the purpose of processing the requests and submissions submitted by the data subjects to exercise their rights related to the management of their personal data (the data subject's name, contact information and other data necessary to identify the data subject, and data provided by him in connection with the matter or his request).

Data management is necessary to fulfill the Data Controller's legal obligations [General Data Protection Regulation Article 6 (1) para. point c)].

**b)** In order to verify the legality of the exercise of the above rights, the Data Controller also processes the data necessary for this (name of the data subject, other data for identification, subject of the request, submission, as well as other - non-special - data recording how the request is handled). In this case, the data management is necessary due to the Data Controller's legitimate interest in the subsequent verifiability of the legality of its procedure [General Data Protection Regulation Article 6 (1) para. point (f)].

## **2.2.2. Duration of data management**

The Data Controller processes the data related to the exercise of the rights of the data subject until the claim related to the exercise of the rights of the data subject is settled [2.2.1.a)], and the data processed for the purpose of the subsequent verifiability of the settlement of the exercise of the rights of the data subject – in view of the general civil law limitation period – is processed for five years [2.2. 1.b)], then deleted.

## **2.2.3. Recipients of personal data and categories of recipients**

The data manager does not forward personal data to other recipients in connection with this data management.

## **2.3. Data management related to the use of cookies**

### **2.3.1. What are cookies?**

A cookie is a small (approx. 4kB) data package, a file that can be interpreted by computers, which is placed on the user's computer by the server running the given internet service when using the internet service or visiting a website in order to be able to use the website or internet service efficiently providing a user experience that meets today's expectations..

### **2.3.2. Cookies used on the website**

We use Google Analytics on the website, which transmits data related to website traffic to Google and through it to the Data Controller as the website operator. Google Analytics is Google's analytical tool that helps website and application owners get a more accurate picture of their visitors' activities. The service - if the user visiting the website consents to the storage of cookies in their browser - uses cookies to collect information and report statistical data on the use of the website without individually identifying the visitors to Google.

The primary purpose of using such data is to enable the Data Controller to operate the website properly, which requires, in particular, the monitoring of website visit data. To this end, the Data Controller compiles and analyzes statistics regarding the use of the website from the information obtained in this way. We also use the data to improve the functions and develop the content of the website by analyzing the usage trends and the traffic of the website and the main characteristics of the traffic.

The Data Controller does not use the data collected with the help of cookies to identify the visitor of the website, and the Data Controller does not connect this data with other potentially identifiable data. Only the third-party service provider handling cookies [Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA] and the Data Controller have access to such data.

Google Analytics cookies used on the website:

name	retention period	collected data	purpose of data management
_ga	2 years	Google Analytics identifier	helps to calculate the number of individual users visiting the website
_ga	1 minute	Google Analytics identifier	helps to calculate the length of the given session of the website visitor
_gid	24 hours	Google Analytics identifier	distinguishing different website visitors anonymously for statistical purposes

For more details on the cookie management of the website, see our [Information about Cookies](#).



## 3. The data subject's rights related to data management

Depending on the legal basis of data processing, the data subject may have the following rights in relation to his personal data managed by the Data Controller:

- right to information and access,
- right to rectification,
- the right to protest
- right to erasure
- the right to block (restrict data processing).

The individual rights listed above are described in more detail below.

The right to data portability [Article 20 of the General Data Protection Regulation] does not apply to the data processing affected by this information.

### 3.1. Management of requests for the exercise of stakeholder rights

You can exercise your request for information regarding the processing of your data, as well as your other rights, by means of a statement or request sent in writing or in person to our contact details below:

*RENEVA Medical Ltd.*

*address: 1112 Budapest, 30-38 Mikes Kelemen utca A/A/3/35.*

*phone: +36305449395*

*e-mail: [adatvedelem@renevamed.com](mailto:adatvedelem@renevamed.com)*

The Data Controller will respond to your statement and request as soon as possible, and no later than 30 days after its receiving, and take the necessary steps based on it. If a longer period of time is needed to fulfill the request - especially considering the complexity of the contents and the number of parallel requests - this 30-day deadline can be extended by a maximum of 2 months, of which we will notify you with the reasons before the end of the original deadline. If you have submitted your request electronically, we will provide the requested information electronically, unless the data subject requests otherwise.

In order to meet the data security requirements and protect the rights of the data subjects, the Data Controller must make sure that the identity of the data subject and the person wishing to exercise their right of access or other rights related to data management match. To this end, it is also necessary to identify the person concerned in order to provide information, view the data, issue a copy of it or exercise certain rights in relation to it.

### **3.2. Right to information and access**

Upon your request, the Data Controller will provide information on whether your personal data is being processed and, if such data processing is in progress, on:

- what personal data it applies to,
- for what purpose and on what legal basis, and
- how long it is expected to last, and how its duration can be determined.

Upon request, the Data Controller will also inform you on:

- to whom, when, on the basis of which legislation, were the personal data granted access to or to whom they got forwarded to,
- the source of personal data (unless you, as the data subject, have provided it to us), and
- whether the data controller uses any automated decision-making (including possible profiling), and if so, based on what logic and system of criteria.

Upon your request, the Data Controller will provide you with a copy of the processed personal data - free of charge for the first time. If you subsequently request the issuance of a copy again, we may charge a reasonable fee based on the associated administrative costs.

### **3.3. Right to rectification**

If the personal data of the data subject is inaccurate, incorrect or – considering the purpose of the data management – incomplete, you can request that the Data Controller correct the given data and, if necessary, complete it.

### **3.4. Right to protest**

If, for reasons related to your own situation, you object to the processing of your personal data for the purpose of asserting the interests of the Data Controller [of the data processes affected by this information in point 2.2.1.b), marked as such], and in your judgment some of your interests are against the interests of the Data Controller, or your fundamental right takes precedence, you can request the termination of the processing of your data with reference to this, which the data controller can only refuse if it proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests or rights indicated by you, or that are used to submit legal claims, are related to its validation or protection.

### **3.5. The right to erasure**

The data subject may request from the Data Controller the deletion of the personal data processed concerning him or her (final termination of data management), and the Data Controller is obliged to delete the personal data if:

- data management is no longer necessary for the purpose for which it was carried out,
- in the case of data management based on consent, the consent has been withdrawn and there is no other valid legal basis for the data management,
- data processing was carried out illegally,
- the data must be deleted due to an EU legal or Hungarian legal requirement,
- the data was collected from an underaged person in connection with the offering of information society-related services.

The Data Controller is not obliged to comply with the deletion request if the processing of the given personal data is necessary for the submission, enforcement, or protection of legal claims.

### **3.6. The right to blocking (restriction of data processing).**

At your request, the Data Controller restricts the processing of your personal data if:

- you dispute the accuracy of your personal data, in which case data processing will be restricted until the Data Controller checks the accuracy of your personal data,
- the data management is illegal and you, as the data subject, oppose the deletion of the data and instead request the restriction of its use,
- the data controller no longer needs the personal data for the purpose of data management, but you, as a data subject, require them to present, enforce or defend some legal claim,
- you exercised your right to protest – for the period until it is determined whether the Data Controller's legitimate reasons take precedence over the legitimate reasons indicated by you.

Limitation of data processing means that the Data Controller processes the personal data subject to the restriction separately from other data, with a clear indication of the nature of the restriction. The data - with the exception of storage - may only be processed with the consent of the data subject, failing which only for the submission, enforcement or protection of legal claims, or for the protection of the rights of other natural or legal persons, or for important public interests defined in EU or Hungarian law.

04/20/2023

RENEVA Medical Ltd.