

# PRIVACY / DATA PROTECTION NOTICE (COOKIE-RELATED DATA MANAGEMENT)

The Data Controller hereby informs you of the information about the processing of your personal data:

# I. Data about the controller:

Name: Doktor24 Medicina Zrt.

Location: 1134 Budapest, Váci út 37. 1. em.

Phone number: +36-1-4433-200

hereinafter referred to as "Data Controller".

Data Protection Officer designated by the Data Controller:

Name: Doktor24 Medicina Zrt., Data Protection Officer

Address: 1134 Budapest, Váci út 37. 1. floor.

E-mail: gdpr@doktor24.hu Phone number:+36-1-4433-200

If you have any questions in relation to this Notice or wish to exercise your rights under this Notice, please contact the Data Protection Officer using one of the contact details above, who will be happy to assist you.

# II. Data controller's data protection commitments:

The Data Controller undertakes to comply with all applicable laws on data processing, in particular Regulation 2016/679 of the European Parliament and of the Council on Data Protection ("GDPR"). The Data Controller reserves the right to change this Notice at any time and will notify you of any changes in due time.

# III. Information on data management:

# 3.1. PROCESSING OF "FUNCTIONAL COOKIES" FOR THE WEBSITE WWW. DOKTOR24.HU

- a. Purpose of processing:
  - · Development of the Data Controller's website
  - · Improving the user experience
  - · Tracking the use of the Data Controller's website
  - Providing a chat service (\_cfduid; wplc)
  - · Sideways (\_icl; wp-)



- Webshop (woocommerce) o Optimonk (OptiMonk)
- · Anonymous statistical data collection, Google Analytics (\_ga, \_gid, NID)
- b. Legal basis for processing: your voluntary consent. However, you have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing carried out before the withdrawal.
- c. Recipients with whom your personal data is shared: -.
- d. The Controller will not transfer your personal data to a third country or an international organization.
  - Duration of storage of personal data: until consent is withdrawn. The data subject can
    delete the cookie from his/her computer or disable the use of cookies in his/her browser. The management of cookies is usually possible in the Tools/Preferences menu of
    browsers, under Privacy settings, under the name cookie or cookie. For more information on how to delete cookies, please see the links below:
  - Firefox: https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-yourcomputer
  - · Chrome: https://support.google.com/chrome/answer/95647
  - Internet Explorer: http://windows.microsoft.com/en-us/internet-explorer/deletemanagecookies#ie=ie-11
  - Mozilla: https://support.mozilla.org/hu/kb/weboldalak-altal-elhelyezett-sutik-torlese-samito
  - Safari: https://support.apple.com/kb/ph21411?locale=en\_US
- e. The transfer of your personal data is not based on a legal or contractual obligation, and the transfer of personal data is not a prerequisite for the conclusion of a contract. Consequence of failure to provide data: your ability to use the website or its functions and services is limited or non-existent.
- f. The Data Controller does not use automated decision-making when processing your personal data.

# 3.2. PROCESSING OF "COOKIES NECESSARY FOR THE BASIC OPERATION" OF THE WEBSITE WWW. DOKTOR24.HU

- a. Purpose of processing:
   To ensure the proper functioning of the Data Controller's website
   To make the use of the Website easier
- b. Legal basis for processing: legitimate interest of the Data Controller. This legitimate interest is the legitimate interest in the proper operation of the Controller's website. ATTENTION! You may object to this data processing, in which case the Controller will only continue the processing if there are compelling legitimate grounds on the part of the Controller which, in the Controller's assessment, override your interests or rights.



- c. Recipients with whom your personal data is shared: -.
- d. The Controller will not transfer your personal data to a third country or international organization.
- e. Duration of storage of personal data: in the case of Session Cookies, the Data Controller stores cookies until the end of the session, and in the case of cookies that facilitate use, the data is stored for three (3) months.
- f. The transfer of your personal data is not based on a legal or contractual obligation, and the transfer of personal data is not a prerequisite for the conclusion of a contract. Consequence of failure to provide data: your ability to use the website or its functions and services is limited or non-existent.
- g. The Data Controller does not use automated decision-making when processing your personal data.

# IV. Your rights regarding data processing:

You also have the following rights in relation to the processing of your personal data: ATTENTION! The GDPR contains a number of detailed rules on these rights, which the Data Controller is obliged to comply with, however, for the sake of clarity and comprehensibility of this Privacy Notice, we have summarized the essence of these rules. If you have any questions, please contact the Data Controller using the contact details provided in Section I, in which case the Data Controller will be happy to provide you with further information about your rights.

# 4.1. RIGHT OF ACCESS:

You have the right to obtain information from the Controller, through the Controller's contact details, as to whether or not your personal data are being processed and, if such processing is taking place, the right to be informed that the Controller is.

- · what personal data;
- · on what legal basis;
- · for what purpose;
- · for how long; and
- to whom, when, under which law, to which personal data, to whom the Controller has granted access or to whom the Controller has transferred the personal data;
- · the source of your personal data;
- whether the Data Controller uses automated decision-making and its logic, including profiling.



The Data Controller will provide you with a copy of the personal data subject to the processing free of charge upon your request for the first time and may charge you a reasonable fee based on administrative costs thereafter. However, please note that the right to request a copy must not adversely affect the rights and freedoms of others.

In order to ensure data security and to protect your rights, the Data Controller is obliged to verify the identity of you and the person who wishes to exercise your right of access, and to this end, any information, access to or copying of data is subject to your identification.

#### 4.2. THE RIGHT TO RECTIFICATION:

You may request the Controller to modify any of your personal data through the contact details of the Controller. If you can credibly demonstrate the accuracy of the corrected data, the Data Controller will comply with the request within a maximum of one month and will notify you accordingly.

# 4.3. THE RIGHT TO ERASURE:

You have the right to erasure in relation to the purposes of the processing set out in points 3.1, 3.2 of this notice. On the basis of this right, you have the right to have the Controller erase your personal data without undue delay upon your request, and the Controller is obliged to erase your personal data without undue delay unless there is another legal basis for the processing of the data.

#### 4.4. THE RIGHT TO RESTRICT PROCESSING:

You may request through the Controller's contact details that the Controller restricts the processing of your personal data (by clearly indicating the limited nature of the processing and ensuring that it is kept separate from other data) if

- contests the accuracy of your personal data (in which case the Controller will limit the processing to the period of time during which it verifies the accuracy of the personal data).
- the processing is unlawful, and you object to the deletion of the data and instead request the restriction of their use;
- the Controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defense of legal claims; or
- You have objected to the processing (in which case the restriction will apply for the period until it is established whether the Data Controller's legitimate grounds prevail over your legitimate grounds).



#### 4.5. THE RIGHT TO PROTEST:

You have the right to object to the processing for the purposes set out in point 3.2 of this notice, in which case the Controller will only continue processing if there are compelling legitimate grounds on the part of the Controller which, in the Controller's assessment, override your interests or rights.

#### 4.6. THE RIGHT TO RESTRICT THE RIGHT TO DATA PORTABILITY:

You have the right to data portability in relation to the purposes of the processing set out in point 3.1 of this notice if the processing is carried out by automated means.

On the basis of this right, you have the right to obtain, through the contact details of the Data Controller, personal data concerning you which you have provided to the Data Controller in a structured, commonly used, machine-readable format, and the right to transmit such data to another data controller without hindrance by the Data Controller in connection with automated processing operations.

#### 4.7. THE PROCEDURAL RULES APPLICABLE TO THE CONTROLLER WHEN EXERCISING YOUR RIGHTS:

Please send any requests to exercise your rights to the Data Protection Officer indicated in point I. using one of the contact details indicated there. The Data Controller will inform you, without undue delay and in any event within one month of receipt of the request, of the action taken on your request to exercise your rights. This time limit may be extended by a further two months if necessary, taking into account the complexity of the request and, where appropriate, the number of requests. The Data Controller shall inform you of the extension of the time limit within one month of receipt of the request, stating the reasons for the delay. If you have made the request by electronic means, the information shall be provided by electronic means where possible, unless you request otherwise.

If the Data Controller does not take action on your request, it will inform you without delay, but at the latest within one month of receipt of the request, of the reasons for the failure to act, of the possibility to lodge a complaint with a supervisory authority and of your right to judicial redress.

The Data Controller shall provide the information and action free of charge. If your request is manifestly unfounded or excessive, in particular because of its repetitive nature, the Data Controller may charge a reasonable fee, taking into account the administrative costs of providing the information or information requested or of taking the action requested, or may refuse to act on the request. The burden of proving that the request is manifestly unfounded or excessive shall lie with the Controller. The Controller shall inform any recipient to whom or with which the personal data have been disclosed of any rectification, erasure, or restriction of access, unless this proves impossible or involves a disproportionate effort. Upon your request, the Controller will inform you of these recipients.



# V. Your right to redress:

#### 5.1. A COMPLAINT TO THE DATA PROTECTION OFFICER:

If you have a complaint about the processing of your personal data, please contact the Data Protection Officer, who will investigate your complaint without delay and inform you of the outcome:

Name: Doktor24 Medicina Zrt. Data Protection Officer

Address: 1134 Budapest, Váci út 37. l. em.

E-mail: gdpr@doktor24.hu

#### 5.2. A COMPLAINT TO THE DATA PROTECTION AUTHORITY:

You have the right to lodge a complaint with a supervisory authority, in particular in the European Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR Regulation or other legislation. The supervisory authority with which the complaint has been lodged is obliged to inform you of the procedural developments and the outcome of the complaint, including your right to judicial remedy.

In Hungary, complaints can be lodged with the National Authority for Data Protection and Freedom of Information as the supervisory authority:

Name: National Authority for Data Protection and Freedom of Information

Headquarters: H-1055 Budapest, Falk Miksa utca 9-11.

Address for correspondence: H-1374 Budapest, Pf.: 603

Phone: +36 13911400 Fax: +3613911410

E-mail: ugyfelszolgalat@naih.hu Website: http://www.naih.hu

### 5.3. THE RIGHT TO COMPENSATION:

Any person who suffers damage as a result of a breach of the GDPR is entitled to receive from the Data Controller or the processor(s) pecuniary compensation and/or damages.

A processor is liable for damage caused by processing only if it has failed to comply with its obligations under the GDPR specifically imposed on processors or if it has disregarded or acted contrary to lawful instructions from the Controller. Where several controllers or several processors are involved in the same processing and are liable for the damage caused by the processing, each controller or processor is jointly and severally liable for the entire damage.

The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.



#### 5.4. THE RIGHT TO JUDICIAL REMEDY:

You have the right to go to court and seek an effective judicial remedy from the court if you believe that your rights under the GDPR have been infringed as a result of the non-compliant processing of your personal data.

Proceedings against the controller or processor shall be brought before the courts of the Member State in which the controller or processor is established. Such proceedings may also be brought before the courts of the Member State in which you are habitually resident, unless the controller or processor is a public authority of a Member State acting in its exercise of official authority.

# VI. Data security:

The Data Controller undertakes to implement appropriate and effective physical, IT, organizational and administrative measures to maintain the confidentiality, integrity and availability of your personal data.

**Data Controller**