

NOTIFICATION REGARDING THE PROCESSING OF PERSONAL DATA

Pursuant to the General Data Protection Regulation (EU) 2016/679 (hereinafter the “GDPR”), the company under the corporate name “Private Clinic Genesis Athens Medical Care Gynaecology and Surgery S.A.” and distinctive tile **GENESIS ATHENS S.A.**, established in Chalandri, Attica (14-16 Papanikoli street) (hereinafter the “Company”), notifies the persons entering the clinic GENESIS ATHENS which operates on the basis of its relevant permit at Chalandri, Attica (14-16 Papanikoli street) or / and the persons which are being contacted via voice call/ video call (e.g. through Skype) for the purposes of proactive or professional medicine or medical diagnosis, about the following:

1. Types of personal data processed by the Company

The data subjects’ personal data which are being processed by the Company are inter alia and as the case may be: (a) contact details (e.g. last name, first name, home telephone number or mobile phone number, address, town, Postal Code, country, email address), date of visit, ID or passport, date of birth, profession, insurance fund, details of private insurance, husband’s/ partner’s details (as per above where relevant), details of the person making the recommendation etc.), (b) data of special category, meaning, health data (medical history, any medical treatment, surgeries etc.) and (c) payout information, including bank card information, bank account numbers, invoice and payment information etc.

The disclosure of the above data constitutes a legal or contractual obligation of the data subject or a precondition for the conclusion of the contract. In case the data subject does not provide the above personal data, wholly or partly, the Company may not be able to provide its services.

2. Source of personal data

The source of the personal data is, as the case may be, the natural person itself that visits the Clinic, doctors, medical companies (including where relevant the company under the name “Human Reproduction K.Pantos – K.Sfakianoudis – Private Clinic Medical LTD”), health service providers, irrespective of their legal form, other professionals in the health sector etc.

Insofar as these persons disclose personal data to the Company which relate to other data subjects, they are themselves responsible to comply with the applicable data protection legislation. In this context, they may need to obtain the data subjects’ consent prior to the disclosure of their personal data to the Company.

3. Purposes of the processing of the personal data

The purposes of the processing of personal data held by the Company are, as appropriate, the following: (a) the preventive or professional medicine, the medical diagnosis, the treatment, where relevant and pursuant to the agreement concluded with a professional in the health sector and the fulfilment of the Company’s obligations in general (including and without being exhaustively mentioned, hospitalization, discharge, arrangement of appointment etc.)¹, (b) the protection of the fundamental rights and freedoms of the data subjects or of any natural person, in case the data subject is legally or physically incapable of giving its consent², (c) to ensure the Company’s legitimate interests³, (d) to assist public, administrative and Independent Authorities and for reasons which are deemed to be material for the public interest⁴, (e) the scientific survey and statistics purposes, which are not considered to be incompatible with the above initial purposes⁵, (f) for direct marketing purposes (e.g. brochure or newsletter) via email. It is to be clarified that electronic communications related data (i.e. email address or phone number for sms only) which were legally obtained, in the context of the service provision or other transaction with the Company may under the law be used for this purpose, without prior consent being required⁶.

4. Recipients of personal data

The personal data may be transmitted, depending on the purpose of the processing and as the case may be, to authorised employees of the Company by department/ by service, medical staff, associate doctors and other partners, doctors/ companies involved in any way in the provision of these services and professionals in the health sector in general (including where relevant the company under the name “Human Reproduction K.Pantos – K.Sfakianoudis – Private Clinic Medical LTD”), collaborating laboratories, to the National Public Health Organisation (EODY), the E-Governance in Social Security (IDIKA), the Greek National Health Service Organisation (EOPYY), the Hellenic Data Protection Authority, other Independent Authorities, Judicial Authorities, Public Services which have to be informed for purposes of public interest, private or public insurance companies, any representatives of the data subjects, provided that they are relevantly authorised, credit institutions, collaborating companies that the Company has contracted with and which process personal data on behalf of the Company (e.g. IT companies, operators of medical machinery etc.) and to their employees, in the context of their responsibilities and all being committed to confidentiality, to professional/ medical confidentiality and to the data protection legislation.

5. Retention of personal data

The retention period of the above data is the time allowed or required by the applicable legislation/ regulation, depending on the nature of the service provided, taking into account the limitation period provided.

6. Data subjects’ rights

The data subject has the following rights according to the GDPR: (a) to receive a copy of his personal data held by the Company, including information about the way of processing. (b) to request the correction of inaccurate personal data and, where applicable, to request the erasure or the restriction of processing, or otherwise to object to the processing of his personal data. (c) to object to the processing of his personal data. (d) to request the modification of his personal data. (e) to request the erasure of his personal data, provided that their storage is not required by law. (f) To request to receive a copy or to have a copy of his personal data transmitted to another company (data portability) (in a machine-readable format), when the processing is essential for the performance of the contract. (g) To lodge a complaint with the competent supervisory authority regarding the way that his personal data are being processed by the Company.

If the data subject wishes to receive more information/ to be notified relating to the processing of his personal data or to exercise any of his aforementioned rights, he needs to send an email to the Data Protection Officer (DPO) solely and exclusively at the email address: dpo@genesishens.gr, or to send a letter to the address of correspondence mentioned above, being explicitly excluded any other means of communication (e.g. fax, phone number).

¹ Legal basis: article 6, para. 1 subpara. (b), (c), (d), (e) and (f) and for the data of special categories article 9, para. 2 (h) of GDPR

² Legal basis: article 6, para. 1 subpara. (d) and for the data of special categories article 9, para. 2 (c) of GDPR

³ Legal basis: article 6, para. 1, subpara. (b) and (f) of GDPR and for the data of special categories article 9 para. 2 (f) of GDPR

⁴ Legal basis: article 6, para. 1, subpara. (c), (e) and (f) of GDPR and for the data of special categories article 9 para. 2 (f), (g) and (i) of GDPR

⁵ Legal basis: article 6, para. 1, subpara. (f) of GDPR and for the data of special categories article 9 para. 2 (j) of GDPR

⁶ Legal basis: article 6, para. 1, subpara. (a) and (f) of GDPR