

PRIVACY NOTICE

Balance Medical Centre

Date of entry into force: 20 May 2025

1. DETAILS OF THE DATA CONTROLLER

- **Name of the data controller:** Balance Medical Centre
- **Registered office of the data controller:** 8960 Lenti, Táncsics utca 2/A.
- **Data controller's tax number:** 21014163-2-20
- **Company registration number:** 20-06-036760
- **Represented by:** Dr Nikolett Szolnoki, Medical Director
- **Email address:** nikolett.szolnoki@balancemedical.hu
- **Telephone number:** +36 20 778 5943
- **Website:** www.medical.balanceresort.hu

2. INTRODUCTION

Balance Medical Centre (hereinafter: the Data Controller) is committed to protecting the personal data of patients, clients and visitors (hereinafter collectively: Data Subjects). The purpose of this privacy notice is to inform Data Subjects about the manner, purpose and legal basis of the processing of their personal data, as well as the rights to which they are entitled.

In the course of its activities, the Data Controller intends to comply fully with the legal requirements governing the processing of personal data, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), and the provisions of Act CXII of 2011 on the right to informational self-determination and freedom of information (Infotv.).

3. BASIC TERMS

- **Personal data:** any information relating to an identified or identifiable natural person.
- **Health data:** personal data relating to the physical or mental health of a natural person, including data relating to healthcare services provided to that natural person which contain information about their state of health.
- **Data processing:** any operation carried out on personal data, such as the collection, recording, storage, use, retrieval, transmission or erasure of data.

- **Data subject:** any identified or identifiable natural person on the basis of specific personal data.

4. SCOPE OF DATA PROCESSED AND PURPOSE OF DATA PROCESSING

4.1. Data processing in connection with the provision of healthcare services

Scope of data processed:

- Identification data (name, birth name, place and date of birth, mother's name, National Insurance number)
- Contact details (address, telephone number, email address)
- Health data (medical history, diagnostic data, treatments administered, medication, previous procedures, laboratory results)
- Medical records (medical reports, discharge summaries, referral letters)

Purpose of data processing: Provision of healthcare services, carrying out diagnostic tests, preparation and delivery of treatments, monitoring of health status, and maintenance of medical records.

Legal basis for data processing:

- The legal basis for the processing of health data is primarily Article 9(2)(h) of the GDPR (provision of healthcare).
- The legal basis for data processing is also Section 136 of Act CLIV of 1997 on healthcare, as well as Act XLVII of 1997 on the processing and protection of health and related personal data.

Duration of data processing: In accordance with the relevant legislation, medical records must be retained for at least 30 years from the date of data collection, and the final report for at least 50 years.

4.2. Data processing relating to booking appointments

Scope of data processed: Name, telephone number, email address, type of treatment, date of booking.

Purpose of data processing: Making appointments, maintaining contact regarding the appointment, sending reminders.

Legal basis for data processing: Article 6(1)(b) of the GDPR (performance of a contract), and Article 6(1)(a) of the GDPR (consent of the data subject) in the case of sending reminders.

Duration of data processing: For 5 years following the booked date (limitation period for civil law claims).

4.3. Data processing relating to invoicing

Scope of data processed: Name, address, tax number (in the case of businesses), the name and price of the service ordered.

Purpose of data processing: Issuing invoices, and fulfilling accounting and tax obligations.

Legal basis for data processing: Article 6(1)(c) of the GDPR (compliance with a legal obligation), Section 169(2) of Act C of 2000 on Accounting.

Duration of data processing: For 8 years from the date of issue of the invoice.

4.4. Data processing in connection with complaint handling

Scope of data processed: Name, address, telephone number, email address, the subject and content of the complaint.

Purpose of data processing: To investigate the complaint, resolve any issues and maintain contact with the complainant.

Legal basis for data processing: Article 6(1)(c) of the GDPR (compliance with a legal obligation), Section 17/A(5) of Act CLV of 1997 on consumer protection.

Duration of data processing: For 5 years from the date of receipt of the complaint.

4.5. Data processing in connection with the sending of newsletters

Scope of data processed: Name, email address.

Purpose of data processing: To provide information about the Data Controller's new services, special offers and professional information.

Legal basis for data processing: Article 6(1)(a) of the GDPR (consent of the data subject).

Duration of data processing: Until consent is withdrawn.

4.6. Data processing on the website

Scope of data processed: Data collected by cookies, IP address, time of visit, pages viewed.

Purpose of data processing: To ensure the proper functioning of the website, to improve the user experience, and to compile statistics.

Legal basis for data processing:

- For cookies necessary for the website to function, Article 6(1)(f) of the GDPR (legitimate interests).

- For cookies used for statistical and marketing purposes: Article 6(1)(a) of the GDPR (consent of the data subject).

Duration of data processing: Cookies necessary for the functioning of the website remain active until the end of the session; cookies used for statistical and marketing purposes remain active until consent is withdrawn, but for a maximum of 2 years.

5. DATA PROCESSORS

The Data Controller may engage data processors to carry out certain data processing operations. Data processors do not make independent decisions; they are authorised to act solely in accordance with the contract concluded with the Data Controller and the instructions received.

5.1. Routine data processing

- **IT service provider:** Bálint Varga, it@balanceresort.hu
 - **Activities:** Server operation, website maintenance, IT security
- **Accountancy firm:** LENT-EXPERT Tax Advisers, Accountants and Auditors Bt. Lenti
 - **Activity:** Processing of invoicing-related data
- **Email service provider:** [Name of email service provider]
 - **Activity:** Provision of an email system

5.2. Ad hoc data processing

- **Legal representative:** The general partner (Lenti Gyógyfürdő Kft.) is authorised to represent **Gyógyvíz-Medicina Egészségügyi Szolgáltató BT.** and acts as its representative through **Péter Katz.**
 - **Activity:** Representation in legal matters
- **Medical consultants, specialists:** Dr Nikolett Szolnoki, Medical Director
 - **Role:** Specialist medical consultation, medical consultation

6. DATA TRANSFER

6.1. Data transfer to public authorities

The Data Controller transfers the Data Subject's health and personal data to the following bodies in accordance with its legal obligations:

- National Health Insurance Fund Administration (NEAK)
- National Public Health and Medical Officer Service (ÁNTSZ)

- National Centre for Public Health (NNK)
- Electronic Healthcare Services Platform (EESZT)

6.2. Data transfers outside the EU

As a general rule, the Data Controller does not transfer the Data Subject's personal data to countries outside the European Union. Should this nevertheless be necessary, the Data Controller shall ensure that appropriate data protection safeguards are in place.

7. DATA SECURITY

The Data Controller shall take all necessary technical and organisational measures to ensure the maximum protection of the Data Subjects' data:

- A strict access control system is applied during data processing
- It uses encrypted data transmission
- It carries out regular backups
- It uses antivirus software and a firewall
- It carries out regular risk assessments
- Access to IT systems containing health data is protected by two-factor authentication
- Stores paper-based documentation in lockable cabinets
- Has developed procedures for handling data protection incidents

8. THE RIGHTS OF DATA SUBJECTS

8.1. The right of access

The Data Subject is entitled to receive confirmation from the Data Controller as to whether their personal data is being processed, and if such processing is taking place, they are entitled to access their personal data and certain information.

8.2. The right to rectification

The Data Subject has the right to have inaccurate personal data concerning them rectified by the Data Controller without undue delay upon request.

8.3. The right to erasure ('the right to be forgotten')

The Data Subject has the right to have the Data Controller erase personal data relating to them without undue delay upon request, provided that certain conditions are met. This right may not be exercised if the processing is necessary for compliance with a legal obligation.

8.4. The right to restriction of processing

The Data Subject is entitled to request that the Data Controller restrict data processing if certain conditions are met, for example, if they contest the accuracy of the data.

8.5. The right to data portability

The Data Subject has the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used and machine-readable format, and to transmit that data to another data controller.

8.6. The right to object

The Data Subject has the right to object at any time, on grounds relating to their particular situation, to the processing of their personal data where such processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or a third party.

8.7. Automated decision-making and profiling

The Data Controller does not use automated decision-making or profiling. Should it engage in such activities in the future, the Data Subject would have the right not to be subject to such decisions and to request human intervention.

9. REMEDIES

9.1. Complaints to the Data Controller

The Data Subject may, in the first instance, lodge any complaints or requests relating to data processing with the Data Controller:

- Email: nikolett.szolnoki@balancemedical.hu
- Postal address: 8960 Lenti, Táncsics utca 2/A.
- Telephone: +36 20 778 5943

The Data Controller will investigate the complaint within 30 days and respond in writing.

9.2. Complaints to the supervisory authority

The Data Subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH):

- Address: 1055 Budapest, Falk Miksa utca 9–11.
- Postal address: 1363 Budapest, P.O. Box 9.
- Telephone: +36 1 391 1400
- Email: ugyfelszolgalat@naih.hu

- Website: www.naih.hu

9.3. Judicial redress

In the event of a breach of the Data Subject's rights, they may bring a claim before a court. Proceedings may also be brought before the court with jurisdiction over the Data Subject's place of residence or habitual residence.

10. AMENDMENTS TO THE PRIVACY NOTICE

The Data Controller reserves the right to amend this Privacy Notice unilaterally. Any amendment shall take effect upon publication on the website. The Data Controller shall inform Data Subjects of any amendments via the website.

This Privacy Notice is effective from the date of publication and remains valid until revoked.

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