



PRIVACY POLICY

**Medicover Försäkrings AB (publ) Magyarországi Fióktelepe
(Medicover Försäkrings AB (publ) Branch Office in Hungary)**

Effective from: 26th July 2023

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The present privacy policy contains the criteria of the activity of **Medicover Försäkrings AB (publ) Magyarországi Fióktelepe** (Medicover Försäkrings AB (publ) Branch Office in Hungary, hereinafter referred to as Medicover) related to the management of personal data. In the following you may be informed about which personal data is managed by Medicover, for which purpose and on which legal basis, for how long, as well as the persons who may learn and access the personal data managed by Medicover. In addition to the above, in the following you may find detailed information on the rights you are entitled to related to the data management and how these rights may be exercised.

If you have any questions or concerns related to the data management or the provisions of the present privacy policy, then please send those to following e-mail address: data.protection@medicover.hu.

Medicover may modify the present privacy policy in particular in case of the introduction of new data management or in case the data management already in progress changes, of which Medicover will notify its clients and other natural persons concerned primarily on its website.

1. How does Medicover manage personal data?

Medicover **manages and protects** the information obtained by Medicover in course of its activity and related to any natural person (e.g. personal identification data, contact data, health data, etc.), i.e. personal data, **as data controller, in compliance with Regulation (EU) 2016/679** on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General data protection regulation – **GDPR**) as well as the relevant Hungarian data protection laws.

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Registered seat and mailing address:	H-1134 Budapest, Váci út 29-31.
E-mail address:	data.protection@medicover.hu
Website address:	www.medicover.hu

The definition of data management related to personal data includes any operation or set of operations which is performed on personal data, such as recording, storage, consultation, use, disclosure, transmission, erasure or destruction. In course of the management of the personal data Medicover takes the necessary and appropriate measures to prevent unauthorized access to the personal data and the unauthorized use thereof.

Therefore, in particular Medicover ensures the physical protection of its facilities (e.g. through

the operation of entry and camera system) and the protection against unauthorized access of its electronic systems (e.g. through the use of firewalls, secure authentication).

The personal data managed by Medcover may be accessed by its employees and contributors, to the extent necessary to fulfil their tasks and to the provision of services to you, subject to confidentiality obligation. In addition, Medcover may transfer the data managed by Medcover to third parties, e.g. to authorities, in order to fulfil its legal obligations. Data may be transferred in order to provide services to you (e.g. in case of the use of external service providers), as well as if Medcover employs any data processor for certain data management operations (e.g. data storage, systematization), which data processor shall act on behalf and according to the instructions of Medcover. Also in case of the latter data management Medcover ensures that the personal data are transferred only to those data processors which provide appropriate guarantees for ensuring the security of the data management and your personal data.

2. Which personal data are managed by Medcover?

Below you may find general information on the data managements of different purposes of Medcover. If you wish to receive customized information, e.g. regarding the exact recipient Medcover had transmitted your personal data and when it did so, then please send your request to the following e-mail address: data.protection@medcover.hu.

A. Data management related to the health insurance service and to the fulfilment of the health insurance contract

Purpose of the data management	Provision of health insurance services, the conclusion, modification and termination of the contract related thereto, fulfilment of the obligations related to the contract, enforcement of rights and claims which may arise in connection with the service, defence against claim enforcement, as well as correspondence.
Legal basis of the data management	Fulfilment of contract for health insurance (GDPR Article 6(1)(b)) Legitimate interest of Medcover (GDPR Article 6 (1) f)) Performance of legal obligation (GDPR Article 6(1) c))
Scope of the personal data concerned	Medcover manages the following data of the client's employees as insured persons in the case of group health insurance, and of the individual costumers as insured persons: - Personal identification data (e.g.: name, date of birth, sex), - Contact data (address, postal address, telephone number, e- mail address), - The name of the employer, and in some cases the job position,

	<ul style="list-style-type: none"> - The name of the insurance package, the start date of the risk bearing, the unique identification number stated by the employer <p>In cases of extended group health insurance, the following data of the insured's relatives:</p> <ul style="list-style-type: none"> - Personal identification data (e.g.: name, date of birth) - Contact data (address, postal address, telephone number, e-mail address) <p>In cases of individual customers the following data is managed by Medcover:</p> <ul style="list-style-type: none"> - Bank account number
<p>Duration of the data management; erasure</p>	<p>Medcover manages all personal data as confidential insurance information during the insurance relationship and after the termination of the insurance contract until the end of the limitation period (deadline for claim enforcement – 5 years). Furthermore the personal data indicated in the invoice and its appendices are managed for 8 years by Medcover under Act C of 2000 on Accounting. After that time the personal data will be erased and destroyed.</p>
<p>Categories of recipients, data transfer</p>	<p>Medcover transfers the personal data sent by the insured persons and/or by their employers, and other personal data relating to health insurance service to the following recipients:</p> <ul style="list-style-type: none"> - to its health care organizer partners for the purpose of the performance of healthcare services; - insurance agents as processors to perform the health insurance contract, - to authorities, courts specified by Act LXXXVIII of 2014 on Insurance Activities upon official request, based on the law; - to its data processor providing document archiving, document storage services, based on data processing contract; - to its data processor providing server hosting services, based on data processing contract; - to companies carrying out the delivery of letters, consignments as data processors, regarding the data necessary to the delivery (name and address), based on data processing contract;

<p>Consequence of failure to provide data</p>	<p>The data provision is necessary for the fulfilment of the health insurance contract and for providing healthcare service, therefore in case of the failure of the data provision, the health insurance services cannot be provided.</p>
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B. Data management personal data concerning health

Which are the personal data concerning health? Personal data concerning health include all data pertaining to the physical or mental health status of a natural person, as well as all data which had emerged related to his/her health status and in connection with the healthcare service used by him/her.

<p>Purpose of the data management</p>	<p>Conclusion, modification and termination of the health insurance contract, including the risk assessment regarding individual customers as insured persons, furthermore the decision on claims, service requests, checking and verifying the insurance funding coverage damage settlement and settlement regarding the individual customers as insured persons and in case of group health insurance service regarding the employees of Medicover's clients as insured persons . Furthermore, the purpose is to enforce claims and to defend against claims.</p>
<p>Legal basis of the data management</p>	<p>Your consent as the data subject by signing the Statement of the Policyholder (Insured) form.</p>
<p>Scope of the personal data concerned</p>	<p>Medicover manages the data concerning health provided by individual clients as insured persons, and regarding all insured persons, the TAJ (social security) identification number and the data concerning health generated during the health care service which are transferred to Medicover with the preliminary consent of the client by the health care service provider.</p>
<p>Duration of the data management; erasure</p>	<p>Medicover manages all data concerning health during the insurance contract and after its termination until the end of the period of limitation (claim enforcement deadline – 5 years). Upon the expiry of these deadlines the healthcare documentation containing the personal data will be erased, destroyed.</p>

Categories of recipients, data transfer	<p>Medicover transfers the data concerning health to the following recipients:</p> <ul style="list-style-type: none"> - to authorities, courts specified by Act LXXXVIII of 2014 on Insurance Activities upon official request thereof, based on the law; - to its data processor providing document archiving, document storage services, based on data processing contract; - to its data processor providing server hosting services, based on data processing contract.
Consequence of failure to provide data	<p>The data provision is necessary for the provision of the fulfilment of the health insurance contract and providing healthcare service, settlement, determination of insurance funding, coverage, therefore in case of the failure of the data provision, the health insurance services cannot be provided.</p>

C. Data management related to complaints

Purpose of the data management	<p>Complaint management, investigation of the circumstances of the case subject to the complaint and the management of the complaint.</p>
Legal basis of the data management	<p>Fulfilment of the legal obligation related to complaint management as specified in Act LXXXVIII of 2014 on Insurance Activities regarding complaint management (GDPR Article 6(1)(c));</p> <p>Your consent as data subject, which you grant to Medicover by submitting the complaint, in particular if the healthcare service was not used by you but for example by your relative, however, the complaint is submitted by you (GDPR Article 6(1)(a)).</p> <p>Fulfilment of contract (GDPR Article 6(1)(b));</p>
Scope of the personal data concerned	<p>The personal identification data provided in the complaint by the party submitting it (typically: name, e-mail address, address), as well as the personal data and – as the case may be – the data concerning health included in the complaint.</p>

Duration of the data management; erasure	According to Act LXXXVIII of 2014 on Insurance Activities, the duration of the data management is 5 years calculated from the conclusion of the complaint case, upon the expiry of this duration the data will be erased, destroyed.
Categories of recipients, data transfer	<p>Medicover transfers the personal data and – as the case may be – data concerning health related to complaints to the following recipients:</p> <ul style="list-style-type: none"> - to its healthcare service organizer partners, for the purpose of investigating the circumstances of the healthcare service subject to the complaint; - to authorities, courts specified by Act LXXXVIII of 2014 on Insurance Activities upon the official inquiry, order thereof, based on the law; - to its data processor providing document archiving, document storage services, based on data processing contract; - to its data processor providing server hosting services, based on data processing contract. - to companies carrying out the delivery of letters, consignments as data processors, the data necessary to the delivery (name and address), based on data processing contract.
Consequence of failure to provide data	All relevant data related to the complaint are necessary to manage the complaint and investigate the circumstances. In case of failure to provide data or in case of incomplete data provision, the complaint cannot be managed or cannot be managed properly.

D. Recording telephone calls

Medicover records and manages the telephone calls by its data processor, based on a data processing contract.

Purpose of the data management	The general purpose of recording the telephone calls is to prove the statements made during the call. In case of complaints made via telephone, the purpose is the exact recording of the complaint. In addition, purposes are the provision of services, proper reply to telephone inquiries, as well as the continuous improvement of the quality of the services of Medicover.
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<p>Legal basis of the data management</p>	<p>Fulfilment of the legal obligation related to compliant management as specified in Act LXXXVIII of 2014 on Insurance Activities regarding complaint management (GDPR Article 6(1)(c));</p> <p>In case of other, no complaint statements, comments, requests made through telephone call the legal based is your consent as data subject what is given by pursuance the call after calling your attention to the recording (GDPR Article 6(1)(a)).</p> <p>In addition, another legal basis is the legitimate interest of Medcover related to quality assurance and enforcement of claims (GDPR Article 6(1)(f)).</p>
<p>Scope of the personal data concerned</p>	<p>The voice of the data subject and the personal data said during the telephone call made to and had on the phone number: +36 1 465 3100, the date, time and duration of the call, as well as your telephone number.</p>
<p>Duration of the data management; erasure</p>	<p>The duration of the data management is consistent with the period of limitation (claim enforcement deadline – 5 years calculated from the end of the call; in case of complaints, calculated from the conclusion of the complaint case), upon the expiry of which period the data will be erased, destroyed.</p>
<p>Categories of recipients, data transfer</p>	<p>Medcover transfers the personal data provided during the telephone call to the following recipients:</p> <ul style="list-style-type: none"> - to authorities, courts specified by Act LXXXVIII of 2014 on Insurance Activities upon official request thereof, based on the law;
<p>Consequence of failure to provide data</p>	<p>Regarding complaints made via telephone, in case of failure to provide data or in case of incomplete data provision, the complaint cannot be managed or cannot be managed properly. In other cases, without the provision of the personal data the request of the data subject cannot be fulfilled, and the question concerning such person cannot be answered.</p>

E. Data management related to other inquiries, client satisfaction questionnaire, as well as correspondence

<p>Purpose of the data management</p>	<p>The purposes of the data management is correspondence, and as the case may be, the fulfilment of the contract concluded with Medicover, provision of services, collection and evaluation of feedback related to the quality of the service, and thereby the improvement of the level of standard of the service. In other cases, the purposes is replying to notifications, inquiries and questions.</p>
<p>Legal basis of the data management</p>	<p>In case of the persons specified by the contractual partners of Medicover as contact person in the contract, the legal basis of the data management is the legitimate interest of Medicover and the contractual partner thereof related to the fulfilment of the contract (GDPR Article 6(1)(f)).</p> <p>In case of other notifications, inquiries, questions and in case of the completion of the client satisfaction questionnaire, your consent as data subject, which you grant Medicover by sending the inquiry, completing and signing the questionnaire (GDPR Article 6(1)(a)).</p>
<p>Scope of the personal data concerned</p>	<p>The</p> <ul style="list-style-type: none"> - name - (work) telephone number, - (work) e-mail address, - further personal data included in the inquiry, notification or client satisfaction questionnaire <p>of the person specified as contact person in the contract, as well as any person who contacts Medicover with any notification, inquiry or question (through the interface to be found at www.medicover.hu website edited by the data processor or Medicover)</p>
<p>Duration of the data management; erasure</p>	<p>In respect of the personal data of the contractual contact person, the data management lasts until the expiry of the period of limitation (claim enforcement deadline – 5 years) during the term and after the termination of the contract concerned. In other cases the duration of the data management is 5 years following the receipt of the inquiry (period of limitation), upon the expiry of which period the data will be erased, destroyed.</p>

Categories of recipients, data transfer	<p>Medicover transmits the personal data to the following recipients:</p> <ul style="list-style-type: none"> - to authorities, courts specified by Act LXXXVIII of 2014 on Insurance Activities upon the official inquiry, order thereof, based on the law; - to its data processor providing document archiving, document storage services, based on data processing contract; - to its data processor providing server hosting services, based on data processing contract. <p>Medicover does not operate own website, it only uses the www.medicover.hu website edited by Medicover Zrt. (Medicover Ltd., seat: H-1134 Budapest, Váci út 29-31.) to introduce its services, and to inform its clients, based on the contract with the website editor. The website editor (and its data processor based on the guarantees specified in the contract) able to reach all data provided on the website.</p>
Consequence of failure to provide data	<p>In the absence of contact person data, correspondence becomes impossible, the requests can not be answered.</p>

F. Management of the data of persons applying to job advertisements and data management related to recruitment database

Purpose of the data management	<p>Filling vacant positions, establishment of own recruitment database.</p>
Legal basis of the data management	<p>The legal basis of the data management is your consent as applicant, which you grant Medicover by submitting your application (GDPR Article 6(1)(a)).</p> <p>In other cases the legal basis is the legitimate interest of Medicover related to filling the vacant positions (GDPR Article 6(1)(f)).</p>

<p>Scope of the personal data concerned</p>	<p>In cases of applicants:</p> <ul style="list-style-type: none"> - name; - contact data (telephone number, e-mail address); - all personal data disclosed by the applicant in his/her curriculum vitae in connection with his/her application. <p>In cases of persons included in the recruitment database of Medcover:</p> <ul style="list-style-type: none"> - name; - and the personal data which the data subject publishes regarding himself/herself on the social networking sites, employment websites (e.g. data related to qualification, professional practice).
<p>Duration of the data management; erasure</p>	<p>In case of unsuccessful application, 2 years after the submission of the application, and in case of persons included in the recruitment database, 2 years after the entry of the data into Medcover's own recruitment database. Afterwards, the data will be erased, destroyed.</p>
<p>Categories of recipients, data transfer</p>	<p>The personal data of the applicants, as well as the data of the persons included in its own recruitment database may be transferred by Medcover to Medcover Ltd. and its subsidiaries as well in Hungary.</p>
<p>Consequence of failure to provide data</p>	<p>Regarding applicants, incomplete data provision does not allow the application to be evaluated successfully.</p>

3. Which rights may be exercised related to the management of personal data?

You have the right to:

- information, access to your personal data, request copies
- the rectification of your personal data,
- withdraw your consent granted to the data management, the erasure of your personal data, i.e. 'to be forgotten',
- object to the data management,
- restrict the data management,
- data portability, and
- legal remedy.

A. Right to information

In addition to the information detailed in Section 2, using the contact details provided in Section 1, you may request specific information related to you from Medcover regarding whether Medcover manages any of your personal data, for which purpose and on what legal basis, for how long, as well as you may request information as to how Medcover obtained your personal data, whether Medcover transferred or provided access to the personal data to any third party, and if yes, then to whom, when, for what purpose. You may also request concrete information on your rights related to the data management. Medcover provides the information for free, however, where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, then – using the opportunity provided by the applicable law – Medcover may (taking into account the administrative costs of providing the information or communication or taking the action requested) charge a reasonable fee or may refuse to act on the request for information.

You may request to be provided with the copy made of your personal data, in electronic or other (in particular paper) format, as consideration of which – using the opportunity provided by the applicable law – Medcover may charge a reasonable fee (based on administrative costs).

Medcover will fulfil with your request for information while respecting the rights of others (in particular the trade secret and the right to the protection of intellectual property).

B. Right to rectification

If you become aware that any of your personal data (therefore in particular e.g. contact data, e-mail address, telephone number) managed by Medcover and stored in its system is incorrect (e.g. due to typo) or incomplete, then upon your request sent to the contact details specified in Section 1, Medcover will amend your incomplete personal data in its systems, and will rectify your incorrect personal data. In addition, Medcover will also notify all those third parties of the rectification to whom Medcover transferred your personal data, except if it is impossible or would require disproportionate effort.

C. Withdrawal of the consent granted to the data management; right to erasure, 'to be forgotten'

You may withdraw your consent to the data management granted at any time, which however does not affect the lawfulness of the data management preceding the withdrawal.

If you withdraw your consent to the data management granted and

- there is no other legal basis for the data management, or
 - the purpose of the data management ceased, or
 - if the data management is unlawful, or
 - the data shall be erased under the law,
- then upon your request sent to the contact details specified in Section 1, Medcover will erase

your personal data from its systems or will destruct your personal data permanently. In addition, Medcover will also notify all those third parties of the erasure to whom Medcover transferred your personal data, except if it is impossible or would require disproportionate effort.

D. Right to object

If the data management is based on the legitimate interest of Medcover or any other third party, then you have the right to object to the data management through the contact details specified in Section 1, in which case Medcover will no longer manage your personal data, except if the data management is justified by any compelling legitimate ground.

E. Restriction of the data management

Through the contact details specified in Section 1, you may request the restriction of the data management related to your personal data, in which case Medcover may only store your personal data without using those or carrying out further data management operations (e.g. transfer, erasure); the latter may occurred during the restriction only if you granted your consent thereto, if those are necessary for exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. In addition, Medcover will also notify all those third parties of the restriction to whom Medcover transferred your personal data, except if it is impossible or would require disproportionate effort.

You may request the restriction of the data management if

- with regard of your opinion the accuracy of your personal data, and you do not want your personal data to be used by Medcover until those are rectified, or
- in your opinion, the data management is unlawful, or
- the purpose of the data management carried out by Medcover ceased, however, you do not want your data to be erased, because you need those for e.g. lodging, defending or enforcing your legal claim.

You may request the restriction simultaneously with the objection to the data management based on the legitimate interest of Medcover or any other third party, in which case the restriction shall apply until the assessment of the request for objection at the latest.

F. Data portability

If the data management is based on your consent, or if data management is necessary for the fulfilment of the contract concluded with you, or if the data management is carried out by automated means, then through the contact details specified in Section 1, you may request that solely those personal data which you provided to Medcover and which are related to you be transferred in a structured, commonly used and machine-readable format to you or another data controller specified by you, and in case of data concerning health, subject release from medical confidentiality. Medcover will comply with your request for information while respecting the rights of others (in particular the trade secret and the right to the protection of intellectual property).

4. How can you enforce the rights related to data management?

You may submit your inquiry or request for exercising your rights related to the data management detailed above to the contact details specified in Section 1. Please provide at least two of your personal data in your request, with which Medicover can identify you (e.g. name and telephone number, name and e-mail address). You may make your request or observation verbally as well, via the telephone number specified in Section 1, however, Medicover will in any case reply or provide information in writing (primarily in the form chosen by you, or in the absence thereof, subject to the discretion of Medicover, electronically via e-mail or on paper, by mail). In your written request (submitted via e-mail or on paper), please specify in which form you would like to receive the reply (electronically via e-mail or on paper, by mail), otherwise Medicover will forward the reply to you in the form consistent with your request. Medicover will provide a reply on the merits of your request or inquiry related to data management within 30 days of the receipt thereof, or within 60 days in exceptional cases (e.g. considering the complexity of the request). In the latter case Medicover will notify you separately of the extension of the deadline for reply and the reasons for the extension, within 1 month of the receipt of the request.

A. I am not of legal age yet; how should I proceed?

If you are not 16 years old yet, then you may enforce the rights detailed above with the approval of your legal representative – i.e. most commonly your parent who exercises the parental rights. If you are over the age of 16 but below the age of 18, then you may grant consent to the data management independently, however, you may exercise the rights detailed above only with the approval of your legal representative, i.e. most commonly your parent who exercises the parental rights.

B. Which rights may be exercised related to the personal data of deceased relatives?

For 5 years following the death of the data subject, the person authorized by the data subject during his/her life in public document or in private document of full probative value may in respect of the personal data of the data subject exercise the rights to information, rectification, erasure, objection and the right to restrict the data management. If the data subject did not authorize anybody during his/her life, then for 5 years following his/her death, his/her close relative (from among the spouse, next of kin, adopted children, stepchildren, foster children, adoptive parents, stepparents, foster parents, and siblings as close relative the person who acts first) shall be entitled to exercise the right to rectification and objection, as well as in case the data management had already been unlawful in the of the data subject, or if the purpose of data management ceased upon the death of the data subject, then the close relative may also exercise the right to erasure and the right to restrict the data management. Medicover shall reply to any inquiry, request related to the personal data of the deceased and received from the person authorized to submit such inquiry, request within 25 days of the receipt thereof.

6. Which legal remedies are available? – Data protection officer, supervisory authority, court

In all matters related to data management and to exercising the rights detailed above, as well as regarding the reply given by Medcover to data management requests and inquiries, you may contact the data protection officer of Medcover, through the following contact details:

The data protection officer of Medcover	
Name:	Ildikó SALAMON
E-mail address:	dpo@medicover.hu
Mailing address:	H-1134 Budapest, Váci út 29-31.

In connection with the data management carried out by Medcover you may lodge a complaint to the data protection supervisory authority, i.e. to the Hungarian National Authority for Data Protection and Freedom of Information, through the following contact details:

Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information)	
Registered seat:	HU-1055 Budapest, Falk Miksa utca 9-11.
Mailing address:	HU-1363 Budapest, Pf.: 9.
E-mail address:	ugyfelszolgalat@naih.hu
Telephone number:	+36 (1) 391-1400
Website:	http://naih.hu

In addition to the above, you may refer to the court in order to enforce your rights and claims related to data management. You may initiate the litigation proceeding before the court of your place of residence or place of stay as well.

Budapest, 26th July 2023

Medcover