

Data Privacy Notice for Patients

Affidea is a medical services provider with high ethical standards. “Affidea” (“we” or “us” or “our”) refers to **AFFIDEA HOLDINGS GREECE LIMITED COMPANY** which is based at 122 Vouliagmenis Av., Elliniko, and its co-controller(s), namely **Affidea BV** (registered address: Vijzelstraat 68 1017HL Amsterdam, Netherlands. Your contact point is our GREECE Data Protection Officer. Contact details can be found in clause 9.

1. Legal basis for processing your personal data

We are committed to protecting your personal data when processing it and we are also required to do so by law. Our medical professionals are subject to both a professional and a contractual duty of confidentiality.

1.1. It is necessary for us to use your personal and health data so that we can provide you the requested medical service.

Processing of your basic personal data (e.g. name and contact details) is necessary for scheduling your appointment and for the delivery of the medical services you need. The *medical service agreement* constitutes the legal basis for processing your basic personal data.

Your health data covers information related to your health (e.g. information about a requested diagnosis/treatment and our health assessment). Providing you with a *medical diagnosis and/or medical treatment* forms the legal basis for processing your health data. Affidea is subject to a *legal obligation* to process (specially to retain) your health data (see clause 3 and Annex 1 for further information).

If you are in an extreme or life-threatening condition while present at one of our clinics, we will use your health data in order to preserve your health and well-being, and on the basis of *protecting your vital interests*.

1.2. We are constantly improving our services.

At Affidea we are always looking for better ways to provide our services.

A) Patient survey

We think that feedback about your patient experience is essential to understand how to best serve our patients. You are therefore invited to take part in our satisfaction survey and we thank you in advance for your input. The participation is optional and will not affect our service to you. If you prefer, we will abstain from contacting you.

B) Statistical analysis of aggregated data

We intend to analyse some of your personal data in an aggregated way, to derive valuable statistical information for our sales and marketing teams, for example to understand which services are of most interest in specific regions. If you prefer, we will exclude your data from our analysis.

C) Quality assurance

We consider crucial to learn from unintended events occurring in our clinics. We record and analyse near misses (incidents prevented) and events that may result in a harm on any kind to assure health and safety. We limit such processing of patient data to the necessary extent, and typically do not use directly identifiable personal data for this purpose.

We do the above for our *legitimate interest* of understanding how to improve our service and its quality. See clause 7.6. about your right to object.

1.3. You can consent to the following additional processing activities of Affidea, if you wish.

By ticking the relevant box in the “your data protection statement” part you can *consent* to the following with no extra cost. If you do not want to give your consent, this will not have any impact on the medical services provided to you.

A) Informing you about opportunities to participate in clinical studies

Affidea is committed to healthcare and the advancement of medical science. We have trustworthy partners, who help pharmaceutical companies or medical device manufacturers to conduct clinical studies in strict compliance with the applicable laws. If you might be interested in participating in such clinical studies, we are happy to inform you about those which potentially fit you (based on the health data we retain about you). We might use all available communication channels to reach out to you. Your consent means no authorization to disclose your data to any third-party, nor any authorization to use your data in a specific clinical study – these require separate informed consent from you, if you express interest further to our initial information about the opportunity.

B) De-identifying a copy of your data

We are committed to continuously improving medical science and to contribute to research and development efforts, whether those are led by Affidea and/or third parties (including but not limited to hospitals, universities and health

insurers). Research and development refer to work for the innovation, introduction and improvement of products, procedures and cost-effective health care provision. It includes a series of investigative activities to improve existing products and procedures or to lead to the development of new products and procedures.

We kindly ask for your support by allowing us to de-identify a copy of your personal data during the retention period determined by laws (see clause 3.). The data set subject to the de-identification includes the health data we collect(ed) when providing you with our medical service. The data set covers both your personal data we collected in the past and the personal data we collect of you in the future if you make use of our medical services. Pursuant to clause 7.1, you have the right to request access to your personal data.

De-identification of personal data consists of a process applied to personal data (or a set of personal data) that makes it impossible to the person using the de-identified data to identify the person to whom the personal data originally related. In this way, you remain anonymous when your de-identified data is used.

We would like to use your de-identified data for research and development, educational, statistical and commercial purposes ourselves or to share it ,with others for or without any consideration for us. We duly select our partners and the method of de-identification to minimize the risks associated to the use of your de-identified data.

C) Contacting you for marketing purposes

We would like to keep you informed of our latest offering in medical services and would like to be able to contact you for that purpose (e-marketing). In addition, if you wish and consent, we can send you personalised promotions, including screening reminders when a repeat examination is due, that you will hopefully find interesting. The use of your personal data for the purposes of sending you personalised promotions is considered to be profiling (see clause 8 for further information).

If you change your mind later, you can withdraw your consent(s) at any time and free of charge, and this will not have any impact on the medical service you receive from us. You can withdraw your consent by contacting our Data Protection Officer (you can see the contact details in clause 9 below). Please note, that the withdrawal of your consent will not affect the lawfulness of processing based on your consent before its withdrawal.

2. Data we process

During your relationship with Affidea, we obtain your personal data from three sources: (1) from you, (2) from others and (3) from our medical activity.

(1) In order to provide you with our medical service, we ask you to provide us with your basic personal data (especially your personal identification data), your payment and insurance data (data necessary in order to pay for our service) and your health data (particularly information about your health condition). If you decide to share previous images and medical reports for us to use, we will store and process these on our systems for the purposes of your medical diagnosis and/or medical treatment. If you voluntarily supply contact information of your next of kin or family, this data will only be used when we are unable to contact you, or in the event of an emergency.

(2) We collect personal data from others in the following instances:

- a) If you are referred to our clinic by a medical provider (referring doctor or hospital) we consult this person about your health condition and/or treatment, if necessary to identify the most appropriate medical service for you.
- b) If the medical service we provide you with, is paid for by a medical insurer (either public or private) we need to gather information about coverage from this insurer in order to provide the medical service to you.

(3) When providing medical services to you, we create health data about you. As a medical services provider, Affidea is required by law to carefully document these services.

For further information about the data we process, please see the Annex of this notice or ask one of our receptionists.

3. How long we retain your data

Affidea retains your personal data as long as necessary to provide our medical services and to comply with applicable medical, tax, accounting or other legislative requirements. If our legal obligation to retain your data expires, we will delete your data or de-identify it. Affidea will not delete your data if an alternative processing purpose for keeping said data exists. For example, in case of legal action or defence against the same. If this is the case, we will retain the data as long as needed for this alternative processing purpose. In case of claims, this will be until the handling of the claim has been completed.

For further information about how long we keep your data, please see the Annex of this notice or ask one of our receptionists.

4. With whom we share your data

During your relationship with Affidea, we share your personal data with three different types of recipients: (1) with providers instructed by us, (2) with providers independent from us and (3) with people you request us to share your data with.

(1) We use service providers (so-called data processors) to assist us in processing the personal information we receive and create (for example medical and financial software vendors and contracted medical professionals). The data processors act on behalf of Affidea based on our written instructions. We only share your data to the extent it is absolutely necessary.

(2) We share your personal data with third parties (meaning recipients independent from us) in the following instances:

- a) If we are required by law.
- b) If required by a contract to which you are a party (e.g. your health insurance contract).
- c) If the protection of your vital interest (e.g. an emergency) so requires, we will share your health data with other medical professionals.

We only share your data to the extent it is absolutely necessary.

(3) You may request that we send your health data to your referrer or your family doctor. The processing activities of third-party recipients are outside our control and responsibility. We therefore recommend that you first ask this third party how they will process your personal data. If you want us to share your health data with other medical professionals, we will ask you to fill a dedicated consent form available from our receptionist.

For further information about the recipients of your personal data, please see the Annex of this notice or ask one of our receptionists.

5. International data transfers

We might have to share your personal data with recipients located outside the European Economic Area ("EEA"). Some countries are considered as Adequate Countries by the European Commission and therefore treated as those belonging to the EEA. Before transferring your data outside the EEA (or outside of an Adequate Country), your data is de-identified or safeguarded, typically by using the Standard Contractual Clauses as approved by the European Commission. The Annex of this notice contains information about the actual data transfers and the measures we use, if any data is transferred in an identifiable format. You can find more information on the Standard Contractual Clause here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en. You can find more information on the adequate countries here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.

6. Keeping your data safe

Keeping your data safe is our priority. Your personal data is stored securely by us, or by our carefully selected service providers. When our service providers process health data on our behalf, we require a high level of security, stipulated also in a written agreement with them. We make sure that very strict protection measures are in place to keep your personal data safe against loss and misuse, as well as unauthorized access or transfer.

7. Your rights

Under the data protection legislation, you have the following rights.

- 7.1. *Right to request access to your personal data:* This means that you are entitled to know that your data is processed by Affidea, that you are entitled to access this data and to be informed about what Affidea does with your personal data.
- 7.2. *Right to request rectification of your personal data:* This means that you are entitled to have your personal data corrected or completed if it is inaccurate or incomplete.
- 7.3. *Right to request erasure of your personal data:* This means that you are entitled to have your personal data deleted in specific circumstances if Affidea has no lawful reason to continue its processing.
- 7.4. *Right to request restriction of processing:* This means that you may request, in specific circumstances, to 'block' the processing of your personal data by Affidea. Your request will mean that we will be allowed to store your personal data, but not to process it further.
- 7.5. *Right to data portability:* It allows you to access and reuse the personal data that you have provided to Affidea so that you can further make use of this data for your own purposes, with different service providers. You are entitled to receive an electronic copy of your personal data and to ask us to transfer it to another controller.
- 7.6. *Right to object to the processing of your personal data.* You are entitled to object, on grounds relating to your particular situation, at any time to processing of your personal data based on our legitimate interest (see clause 1.2. of this Notice). You can also object to our using your personal data for direct marketing purposes.

If you wish to use your rights or wish to have further information about your rights above, please ask one of our receptionists or contact our Data Protection Officer (you can see the contact details in clause 9 below).

8. Automated individual decision-making, profiling

Affidea is not processing your personal data for automated individual decision-making. We only do profiling (meaning an automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person) in two instances:

(i) If you explicitly authorise us to send you personalised promotions (see clause 1.3 / B.). The only consequence of this permission is that you will receive personalized information, offers, or reminders about medical examinations. Affidea does not use this marketing profiling to take any decision about you or your medical condition.

(ii) If the reading of a diagnostic image by a radiologists is supported by an algorithm (e.g. in case of post processing of MRI images). Your medical condition is diagnosed always with an involvement of a radiologist, no medical diagnosis is made solely with automated processing of diagnostic images.

9. If you have any questions

If you have any questions or would like more information, please feel free to contact our Data Protection Officer (e-mail: dpo.gr@affidea.com, postal address: 122 Vouliagmenis Street, Elliniko, TK 16777, tel.: 2106148780) or ask one of our receptionists for further information. If you are unhappy with the way we process your data, you can make a complaint to the Supervisory Authority, typically the Supervisory Authority of your habitual residence or where you work. The contact details of that Supervisory Authority are (e-mail: contact@dpa.gr, 1-3 Kifissias Ave., Athens TK 115 23, tel.: 2106475600). However, we would of course hope that you are able to raise any issues with us in the first instance.

Annex to the Data Privacy Policy

Below you will find further information regarding the persons with whom we share your data. We only share your data with other recipients if absolutely necessary.

<i>Data recipients acting on behalf of (and at the direction of) Affidea</i>				
Branch	Field of Activity	Sub-category of Activity	Kind of Activity	Identity / Location of Recipient
Medical	Health Professionals	Doctors	Provision of medical services	in Greece
	Health Professionals	Other health care professionals	Provision of medical services	in Greece
	Health Professionals	Radiologist	Provision of second opinion, if necessary	in Greece or within Affidea Group, if that is necessary
Services Providers	Management	Call center	Schedule visits by calling the call center	in Greece
	Handling of Medical Equipment	Maintenance	Maintenance of Medical Equipment	in Greece
Advertisement	Promotion	Informational e-mails	Sending newsletters, if you have consented to the marketing activity	in Greece
	Customer Database Management	Data storage	Storing customer contact information, if you have consented to marketing activity	in Greece or within Affidea Group, if that is necessary
Information Technology	Electronic Communication	E-mails	E-mail Operation and Reception System	Microsoft
	Management Software	Call Center Software	Storage of call voice recordings	in Greece
	Management Software	Operation and reception of online patient portal	Online booking	in Greece
	Medical Software	Radiological Imaging/information system	Patient intake/registration, scheduling, creation of examination and diagnosis data, payment support, distribution of medical opinions	Biotronics
		Image/Image and Communication Archiving System	Storage of diagnostic images	Biotronics
	Accounting software provider	Bookkeeping	Pricing of health services cost	in Greece
	Operation	Operation (IT) of IT infrastructures	Ensuring access to data	in Greece
	Support	User support	Securing access to systems	Microsoft
		Support system	Software maintenance	Microsoft
	Data storage	Backup system for data	Ensuring access to data	Infomed

Third parties as recipients of data (acting independently of Affidea)			
Branch	Field of Activity	Sub-category of Activity	Kind of Activity
Health Insurance Agency	Private health insurance	Financing	Confirmation of insurance coverage
	Public health insurance	Financing	Confirmation of insurance coverage
		Operation of the Public Health Database	Storage of medical records/files funded by Public Health Insurance
Financial institution	Bank	Payment	Payment made by debit or credit card
	Private Health Fund	Payment	Reimbursement of health expenses
Medical	Διαχείριση Δημόσιας Υγείας	Public Health Organization	Management of national resources if medical services are publicly subsidized
	Ambulance	-	Transporting patients to or from our medical center
	Referring physician/ Health Organization	-	Patient referral
	Clinical Research Organization	Clinical Research	Requests and uses of clinical research results, if you participate
Public Authority	Medical Authority, Police, etc.	-	Exercise of investigative power
Insurance	Insurance Service	-	In the event that you file a claim regarding our medical services
Accounting control	External Audit Organization	-	Quality standards control
	Certified Chartered Accountant	-	Audit of accounting books
Contact	Mail service	-	Sending e-mail correspondence
	Telephone service	-	Operation and maintenance of telephone system

Below you can also find further information about the type of data we process for various purposes (as outlined in sections 1.1 - 1.3. above) and how long we keep your data for these purposes.

Personal data to be processed				
Purpose of data processing	Type of personal data	Example of personal data	Processing reason	Retention period
Medical services	Basic personal data	Name, SSN, telephone number, address, e-mail address	Appointment scheduling, registration, patient identification, maintaining patient contact/communication	10 years since your last visit
	Medical data	Prescribing, Medical History/File Records, Diagnosis	Patient safety, confirmation of correct medical procedure, production of medical diagnosis and planning of medical treatment	10 years since your last visit
	Financial and insurance details	Proof of insurance coverage, credit card details	Funding and payment	10 years since your last visit
	Other personal data	Identity of referring/family doctor	Contacting another health care provider for further medical data for optimal care	10 years since your last visit
Longer retention of medical records after your consent	As described in detail above			
Anonymization of your data to improve medical services	Anonymous Medical Data	Diagnosis	Research and development	Your non-identifiable personal data is kept
General Information actions	Basic personal data	Name, phone number, address, email address	Sending you general information	Until the end of the retention period as described above
Personalized Information actions	Basic personal data	Name, phone number, address, email address	Sending personalized information to you	Until the end of the retention period as described above
	Medical data	Type and date of your diagnosis and/or medical treatment at Affidea		

