

Data Processing Policy

Prologue

At the EUROCLINIC Group, protecting your privacy and preserving security of your health information and health data is our fundamental priority.

To ensure your data protection, we ask you to be informed of the present Data Processing Policy, regarding the processing of personal data that is carried out in all of our Group Companies.

At the Euroclinic Group, we collect and process your personal data in accordance with this Data Processing Policy and in compliance with EU Regulation 2016/679 (“GDPR”), the Greek data protection legislation, the current legal framework for the provision of health services and the Code of Medical Conduct and Ethics, as well as with the consents we receive from our patients. This policy provides you with the necessary information regarding your rights and obligations and explains how, why and when we collect and process your personal data.

We maintain the required licenses, and we are registered to the Hellenic Data Protection Authority, as data controllers.

This Policy, as well as our Privacy Notice (EYP-DP-E01.01^α / EYP-DP-E01.01^β Privacy Notice), are available at all points of reception of our facilities/premises, as well as on our web site www.euroclinic.gr. We intend to provide to every person who is receiving or is interested to receive medical services in any company of our Group, concise, accurate and transparent information regarding the practices used for the management and protection of personal data. Similarly, with the present Policy, we are informing the visitors of our web site as well as of the social networks of the Euroclinic Group, the suppliers (natural persons) and external partners (natural persons) who provide services to Euroclinic Group (excluding health professionals) as well as the prospective employees about the processing of their personal data.

When you enter the Euroclinic Group for the provision of health services to you, information about you, your contact information and identity, as well as your demographics, your clinical symptoms, the medical treatments you have received, your personal medical history, the medical treatment you are receiving, your family - medical history will be recorded, both in printed and digital media, to help us provide you with the best medical care and the full range of medical services that will be deemed appropriate for your diagnosis, as well as your treatment in general.

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Your health record or patient's file is the collection point of all the information that is collected in any contact you make as a patient with all the healthcare professionals in our Clinic. A file is created for each patient to support his assessment, diagnosis and treatment, continuity in his health care, clinical exchange of information, security and improvement of health care provided, and meet the requirements set by the legislation (Law 3418/2005) and the state. The information entered in the patient's file is sensitive personal data and is therefore considered confidential.

The Euroclinic Group makes every possible effort to process only your personal data that is required to meet legal, regulatory and contractual obligations and in order to provide you with health and hospitalization services in accordance with international medical standards and best practices. We will never collect any unnecessary personal data from you and we will not process your data in any way other than what is stated in this policy. We take every possible and appropriate measure to only collect and process data that are absolutely necessary.

Euroclinic Group reserves the right to modify and update this Policy whenever deemed necessary. The changes, will take effect when they publicly appear on our website (www.euroclinic.gr). Any revised version of the present policy, which is made public on our website (www.euroclinic.gr) **prevails** over any printed version.

Definitions

- The terms '**personal data**', '**processing**', '**data controller**', '**data processor**', '**data subject**', '**genetic data**', '**biometric data**', '**special categories of personal data**', '**Data Protection Officer**' and '**personal data breach**' have the same meaning as in the GDPR of the EU (2016/679).
- **Health Data:** Health Data are Personal Data related to the physical or mental health of a subject, including the patient's registry number, the health services provided, laboratory test values, such as, for example, haematological results etc.
- **Transfer:** Transfer of personal data is considered the disclosure of the Personal Data, with sender having the intention or being aware, that the recipient (or recipients) will gain access to it.
- **Data Subject Request:** The request submitted by the Data Subject to exercise any right under the Data Protection Legislation.

Our organization has appointed a Data Protection Officer (DPO), with whom you can get in touch directly for any related issue at the telephone number: 210.6416600 / 210.6416126 and at the e-mail: dataprivacy@euroclinic.gr.

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Data Controller Details

Euroclinic Group of companies, ("Euroclinic Athens", located at 7-9 Athanasiadou street in Athens and registered in the Greek Chamber of Commerce under the No: 000278101000 / VAT No: 094028438) or/and Private Diagnostic Center ("SIMEIO DYIO - POLYIATREIO", located at 24th Tsoha Street in Athens and registered in the Greek Chamber of Commerce under the No: 140474201000 / VAT No: 800773883).

Categories of Personal Data

The personal data we collect from you are:

1. For the clients/patients of Euroclinic Group:

- Your Personal data: Contact details: name/surname, home address, occupation (according to article 26 of Law 4600/2019 FEK A' 43 / 09-03-2019), personal e-mail, corporate e-mail, home phone, mobile phone, work phone, name/surname and contact details of your escort and/or your family etc. Demographics and identity data: date of birth, identity card number, passport number, VAT number, AMKA, details of the financial liability of the cost of your hospitalization, insurance details if you use a health insurance policy from a private insurance company, etc. Financial details: bank account number/IBAN etc.
- Your Special categories of data: The medical file in printed and electronic form, with the medical data and information necessary for the provision of health services.

2. For the suppliers (natural persons) and external partners (natural persons) who provide services to Euroclinic Group, including your employees and partners, we collect the following Personal data of you:

Contact details: name/surname, home address/work address, phone, e-mail etc. Demographics and identity data: identity card number, VAT number etc. Financial details: bank account number/IBAN etc. Professional data/data about your occupation: professional status, job description, data contained in professional status documents etc.

3. Moreover, we collect CCTV image data (images captured through the CCTV system) when you enter the facilities of Euroclinic Group where a CCTV system is operated for the safety of persons and goods in our facilities; for more detailed information, please trace the document «*Ενημέρωση Β' Επιπέδου για CCTV*» which is published on our website www.euroclinic.gr.

How do we collect Personal Data

- By asking you at the reception and service points of our Group.
- By filling in the documents that are intended to be your health records/patient's file after receiving information that you provide to us and following your examination by the Euroclinic Group's health professionals as well as the results of the diagnostic tests you are performing.

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- When you provide your personal ID, your insurance policy number and you declare that you wish to make use of your insurance benefits.
- By the people accompanying you or having a legal right to act on your behalf (your personal representative) if you are under the age of 16 or you are unable to provide this information yourself.
- When you visit our website, www.euroclinic.gr, when you fill out electronic forms for the scheduling of examination or for receiving other medical services.
- When you provide us, as a supplier and/or external partner of Euroclinic Group, your personal data during the conclusion, performance and termination of the cooperation agreement between us, including your communication with us in any way (such as by telephone or e-mail) as well as by your employer (when you provide services on behalf of a partner or supplier of Euroclinic Group) and/or from publicly available sources in which there are information related to your professional activity (e.g. General Commercial Register (G.E.MI.)).

Purpose & Legal basis for Processing your Personal Data

The authorized personnel of Euroclinic Group processes your personal data, including your Special categories of data, both by automated as well as by non-automated means, if processing is necessary, for the following purposes and according to the following legal bases:

1. For the performance of the contract between us and the provision of health services that you request and wish to receive from Euroclinic Group of companies (including, inter alia, the processing of your necessary personal data for appointment arrangement/confirmation, necessary communication in order for you to receive the results, communication for re-examination under current health protocols, test preparation, patient satisfaction survey), the execution and the compliance with legal obligations and the exercise of Euroclinic Group's rights as a Data Controller, according to the **GDPR, Article 6, par. 1 (b), (c) and (f)**.
2. For the purposes of preventive or occupational medicine, medical diagnosis, the provision of health care or treatment or the management of health care systems and services, according to the **GDPR, Article 9, par. 2 (h)**.
3. For the purposes and the protection of the legitimate interests of the Data Controller, including, inter alia, the management of health services, the collection of hospital bills and the safety of persons and goods in our facilities through a CCTV system, according to the **GDPR, Article 6, par. 1 (f)**.
4. For the establishment, exercise and/or defense of legal claims and/or the defense of Euroclinic Group's rights before Courts, Administrative, Judicial or Independent Authorities or in the context of an extrajudicial

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procedure, for purposes of exercising or defending Euroclinic Group's or third parties' rights before any Judicial or other Authorities etc. according to the **GDPR, Article 9, par. 2 (f)**.

5. For the compliance with legal obligations to which Euroclinic Group is subject, as those obligations derive from tax law, social security legislation etc. and for the purpose of exercising specific rights in the field of social security and social protection law, in accordance with the **GDPR, Article 6, par. 1 (c) and Article 9, par. 2 (b)**.

6. For the protection of your vital interests, if you are in a state of emergency or in a state where your life is threatened, in accordance with the **GDPR, Article 9, par. 2 (c) and Article 6, par. 1 (d)**.

7. For reasons of public interest in the area of public health, such as scientific research carried out in the public interest in the field of health, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or national law, in accordance with the **GDPR, Article 9, par. 2 (i)**.

8. In case of scientific research or for statistical purposes. The legal basis, depending the specific circumstances, is the purpose of Scientific Research or statistical purposes, in accordance with the **GDPR, Article 9, par 2 (j)** and the legitimate interest pursued by the Data Controller or by a third party under the **GDPR, Article 6, par. 1 (f) or** your prior explicit consent, in accordance with the **GDPR, Article 9, par. 2 (a) and Article 6, par. 1 (a)**.

9. Your personal data will be transferred to public authorities, if it is required by law, in accordance with the **GDPR, Article 4 (9) or** in accordance with the **GDPR, Article 6, par. 1 (c) and Article 9, par. 2 (b) or (g) or (h) or (i)**.

10. If further processing of your personal data is carried out, this processing is based on the provision of your prior explicit consent, such as, inter alia, in the case you have given us your explicit consent to contact you for the purpose of informing you about scientific and other health developments, healthcare campaigns and new services offered to the Group, in accordance with the **GDPR, Article 6, par. 1 (a) and Article 9, par. 2 (a)**. You have the right to withdraw your consent at any time by contacting the Euroclinic Group in writing, a fact that however will not affect in any way the lawfulness of the processing made until the withdrawal of your consent.

Recipients of your Personal Data

We do not share or disclose your personal data without your consent for any other than the purposes set out in this policy or where it is required by law. To the extent that is strictly necessary for the purposes set out in this policy or where it is required by law, may gain access to your personal data, on a case-by-case basis, the personnel and other medical, nursing and administrative personnel of Euroclinic Group, cooperating

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physicians who provide independent services to Euroclinic Group, professionals and companies providing services in the health sector.

Euroclinic Group uses selected partners to provide the following services and business functions, however all the processors acting on our behalf, process your personal data in accordance with the instructions they receive from us and fully comply with this policy, the data protection laws and any other appropriate confidentiality and security measures. The main categories of data processors, with which we will share your data, include:

- External private or public sector diagnostic laboratories for specialized examinations (e.g. Pasteur Institute)
- Public Social Security Organizations / Health Funds
- Insurance Companies and their affiliated Audit Firms
- Call Centers and Coordinating Centers for Servicing Your Health Insurance Programs that we undertake to serve
- Suppliers of Medical Equipment to ensure "traceability" and protect your health
- Translation companies / translators
- Organizations and IT service providers supporting and supporting information systems, providers of specialized software and applications related to the health sector (e.g. for diagnostic purposes)
- Supervisory Authorities and Organizations under the authority of the Ministry of Health
- Storage and filing companies
- Providers of courier services
- Call Centers and Coordinating Centers used for appointment arrangement/confirmation, communication for the receipt of the results, communication for re-examination under current health protocols, for the conduction of patient satisfaction surveys and/or to receive and manage complaints from our patients
- Technical advisers
- Financial institutions, debtor information companies, law firms, for the purpose of execution of the contract between us and in order to safeguard our legitimate interest regarding the collection and settlement of accounts.

Euroclinic Group, for the purposes set out in this policy and/or as required by the legal framework, may transmit your personal data to Courts, Administrative, Judicial or Independent Authorities as well as to other public authorities (including, inter alia, the Ministry of Health and the National Organization For Health Care Services (EOPYY)), to the "e-Government Center for Social Security" ("IDIKA"), to the "Kentro

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Tekmiriosis kai Kostologisis Nosokomeiakon Ypiresion Anonymi Etaireia" ("Greek D.R.G. Institute S.A. or "KE.TE.K.N.Y. A.E.") and to other authorities and organizations.

Exceptionally and only if it is absolutely necessary for the performance of the contract between us for the provision of health services that you request and wish to receive from Euroclinic Group of companies, for safeguarding your vital interest, for reasons of a legal obligation of Euroclinic Group or for reasons of public interest as defined by law and/or based on your consent, we may transfer your personal data to recipients located outside the European Union (such as private and/or public insurance bodies, competent police, judicial, administrative, tax authorities upon their valid request, partners/data processors of Euroclinic Group), if the appropriate guarantees in accordance with existing personal data protection legislation for this transfer exist.

Methods of Receiving/ Sending Medical Results

"Euroclinic Group", in the context of the personal data protection practices it applies, adopts the following methods of delivering/sending your Medical Results:

- Direct communication and delivery of information containing personal data directly to you, our patient, and not to any third entity.
- The delivery of information that contains personal data to any third entity is only allowed if you, our patient, have consented and officially authorized each third entity for this purpose (EYP-DP-E01.03^α / EYP-DP-E01.03^β Medical Results Receipt Management Declaration).
- The avoidance of sending personal health information by fax, and if it is deemed necessary, to confirm reception by the authorized recipient.
- The prioritization of using safe electronic means (e.g. e-mail) for external communication, where encryption of sensitive personal data (health data) is possible.
- The avoidance of transmitting personal health-related data by telephone except in exceptional cases, where data is only being transmitted to your doctors, in order to protect your vital interests.
- Sending medical results by post, only by registered mail.

Security Measures

At the Euroclinic Group, we adopt all the reasonable technical and organizational measures and precautions to protect and safeguard your personal data. We work hard to protect you and your data from unauthorized access, modification, transfer, deletion or any other processing, and we have created various levels of security measures such as role-based access management, strong password controls, network security checks, security incident response procedure and encryption.

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How long do we keep your data

Euroclinic Group maintains personal data only for as long as it is necessary.

The data retention period is determined based on the following criteria per case:

- a) When the processing of your personal data is carried out pursuant to a relevant contract between you and a company of Euroclinic Group, such as -inter alia- in the case of contracts we conclude with the suppliers and external partners that provide services to Euroclinic Group, your personal data are maintained for as long as it is necessary for the performance of the contract and the establishment, exercise and/or defense of legal claims arising out of this contract.
- b) When the processing of your personal data is imposed as an obligation by provisions of the applicable legal framework, your personal data is maintained for as long as the relevant provisions impose. It is specifically stated that according to the Greek Law (3418/2005, FEK A 287/28.11.2005, Article 14), we are obliged to keep the data concerning your health for at least twenty (20) years, starting from your last visit to the hospital.
- c) When the processing of your personal data is necessary for reasons of legitimate interest of the Data Controller or a third party, such as -inter alia- in the case of the operation of a CCTV system, your personal data are maintained for as long as it is necessary to fulfill those legitimate interests.
- d) If you provided us with your explicit consent to the use of your personal data for marketing purposes, we will maintain this data until you notify us of something different and/or withdraw your consent, by sending a relevant written request to unsubscribe@euroclinic.gr, a fact that however will not affect in any way the lawfulness of the processing made until the withdrawal of your consent.

Data Subject Rights

Regarding your personal data, you have the option of exercising the following rights, by submitting a written request in person or through your legally authorized representative at the Euroclinic Group's premises or by sending the request by post, with your authenticated signature.

- (a) Right to information and right of access to all personal data that the Euroclinic Group maintains and processes with respect to you, the type of processing, the purposes of processing, the recipients or categories of recipients of your personal data, as well as the personal data retention policy.
- (b) Right to rectification. If you believe that we have any incomplete or inaccurate data about you, you have the right to ask us to correct and / or supplement this information.
- c) Right to delete your personal data in the following cases:

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- when your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed
- when you withdraw your consent based on which your personal data was processed and there is no other legal basis for processing
- when your personal data has been processed without the necessary legal basis
- When the law requires you to delete your personal data

(d) Right to limit processing in the following cases:

- when you dispute the accuracy of your personal data and until the Euroclinic Group verifies its accuracy
- when you are requesting the restriction of the processing of your personal data instead of deleting it
- when the Euroclinic Group no longer requires your personal data for the processing purposes, but your personal data is required by you for the foundation, exercise or support of legal claims

(e) Data Portability, i.e. you have the right to request the transfer of your data to another healthcare provider in Greece or abroad, in the cases where the processing is carried out by automated means and the processing is based on your consent or on a contract.

(f) Oppose your processing of your personal data unless there are compelling and legitimate reasons for processing overriding your interests, rights and freedoms, or for the establishment, exercise or support of legal claims of the Euroclinic Group.

g) Right to object to any direct marketing by us and / or any automated decision-making process we may be using.

The rights to delete or restrict the processing of personal data are not applicable if the processing or maintenance of data by the Euroclinic Group is mandatory or necessary under the law and for the foundation, exercise or support of its legal claims and rights or the fulfilling of its obligations.

In order to carry out **any** of the above rights, it is our strict policy to **confirm your identity**. This is to confirm that your personal data is protected and kept secure.

Euroclinic Group will respond to your request free of charge, without delay and in any case within one month of receipt of the request, except in exceptional circumstances, when that deadline can be extended by a further two months if necessary, taking into account the complexity of the request and the number of requests. The Euroclinic Group will inform you of any extension within one month of receipt of the request, as well as of the reasons for the delay.

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If it is not possible to meet your request, the Euroclinic Group will inform you without delay and at the latest within one month of the receipt of the request, about the reasons. Finally, you have the option to file a complaint to the Hellenic Data Protection Authority (HDPA) www.dpa.gr.

Data Protection Officer Details

For any clarification regarding the processing of your personal data, please contact the Data Protection Officer of our Group: dataprivacy@euroclinic.gr.

Social Networks of the Euroclinic Group

Any publications or comments you send to the Social Networks of the Euroclinic Group (for example, on our Facebook page), will be transmitted according to the terms of the relevant social networking platform (e.g. Facebook / Instagram). Other organizations, not the Euroclinic Group, control these platforms. We are not responsible for this disclosure of your personal information. We encourage you to review the terms and privacy policies of your social networking platforms. This way, you will understand your information is used or shared, and how to prevent it if you are not satisfied with it.

Euroclinic Group Website (www.euroclinic.gr)

The website www.euroclinic.gr has been created by the company "Euroclinic Group", "Euroclinic Athens", aiming to provide information to the visitors/users of the Website. When you visit our website we collect technical and other information about your activity on it automatically through the browsing system you use on your terminal device, such as IP address etc. By visiting our Web Site, you accept the terms that govern it, and you accept to use it as defined by those terms (<https://www.euroclinic.gr/terms/>).

Cookies

The Euroclinic Group's website uses "Cookies". Cookies are small pieces of information sent by us to your computer (via your web browser) and stored on your hard drive, to allow to our site to recognize you when you visit the site again in the future. Cookies collect statistics on your browsing activities, but they do not identify you as a person. They help us improve our web site and provide a better, more personalized service. Through the cookies implementation platform of our site, you can choose to which cookies to give your consent. For more detailed information, please trace our "Cookies Policy", which is published on our Group's website, <https://www.euroclinic.gr/politiki-cookies/>.

Newsletter

By entering your e-mail, you accept to be receiving our Newsletter, which is presenting the services offered by the Euroclinic Group. Your email will only be used by the Euroclinic Group (Data Controller) for the purpose of sending the newsletter to you, and will only be communicated to our partner [Artime One-Person

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Ltd.] (Data Processor) who will be sending the newsletters. You can withdraw your consent at any time by following the link at the bottom of each Newsletter. Your email will be retained in our database, for the purpose of sending you the Newsletter, until your consent is revoked, a fact that however will not affect in any way the lawfulness of the processing made until the withdrawal of your consent.

In order to document your electronic statement of consent, regarding the newsletter service offered by the Euroclinic Group, as well as to serve your possible request for access, we store the IP address from which the request came, as well as the time and date of the registration request.

CVs

Your personal data contained in the CVs (name/surname, date/place of birth, home address, education, work experience etc.) that you send us for the vacancies published on our website, www.euroclinic.gr, will be kept in our database for 12 (twelve) months. They will be used exclusively for the purpose of the communication by Euroclinic Group with you in order to inform you regarding new immediate available job vacancies in our Group, for the purpose of re-evaluation and in order to keep evidence in case of complaints, and will not be transferred to any third entity. Legal basis for the processing is the taking of measures at the request of the prospective employee according to the **GDPR, Article 6, par. 1 (b)** -in the case of the evaluation of your application in the context of employee selection for the staffing of the companies of our Group / job filling-, as well as the legitimate interest of our Group in accordance with the **GDPR, Article 6, par. 1 (f)** -in the case of keeping, for 12 months, your personal data contained in the CV that you send us, in view of immediate employment opportunities in the Group and the preservation of evidence in case of complaints. You have the right to object to the retention of your resume in our company's database for 12 months and the right to request its deletion by sending us a written request at cv@euroclinic.gr.

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