

## Data Handling Notice for Clients

In the course of its operations, UOIEA Zrt. (hereinafter: Organization) and its web page [www.phaeyde.com](http://www.phaeyde.com) (hereinafter: Website), will handle the personal data of natural persons giving their personal data to the Organization, Visitors to the Website, Registrants of the Website or others providing their personal data (hereinafter, Data Subjects). The Organization hereby informs Data Subjects that it handles information about them, the principles and practices it uses when treating personal data, as well as the rights of the Data Subjects and their means of practicing those rights. By agreeing, the Data Subjects accept the contents of the Data Handling notice, and agree to the data processing practices described below.

### 1. Name of the Data Controller Organization

**Company name: UOIEA Zrt.**

**Headquarters, mailing address: 1135 Budapest, Szegedi út 56. D2. lház. földszint 2.**

**E-mail: [uoieazrt@gmail.com](mailto:uoieazrt@gmail.com)**

**Tax number: 27449116-2-41**

**Company registration number: 01-10-141567**

### 2. Data protection laws

While performing data handling, the Organization takes into account all relevant laws in effect at the time. The Data Handling policies outlined in this notice correspond to the following legislation:

- 1992, Hungarian law LXVI – concerning the personal data and addresses of citizens;
- 1995, Hungarian law CXIX – concerning the handling of name and address data for research and for direct marketing (DM law);
- 2001, Hungarian law CVIII – on certain questions in electronic commerce services, and certain aspects connected to providing service within an information society;
- 2008, Hungarian law XLVIII – on basic conditions for economic advertising activities, and certain limitations therein (Grt.)
- 2011 Hungarian law CXII – on the right to self-management of information and about information freedom (Infotv.)
- General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR).

### 3. Concepts

#### 3.1 Personal information

Any specified data that may identify based on personal information, either directly or indirectly, a natural person (hereinafter Data Subject), or with respect to a natural person – in particular the Data Subject's name, username, or one or more physical, physiological, mental, economic, cultural, social identity or data that implies information about this data- or any conclusions that may be drawn about the Data Subject from such data.

#### 3.2 Consent

Refers to the voluntary, decisive expression of the Data Subject that is based on a sufficient notice stating that the Data Subject unambiguously agrees to the treatment of its personal data, either in all respects or limited in scope to certain uses.

#### 3.3 Right to object

Statement by the Data Subject that it objects to handling of its personal data, and requests data collection to stop, and for handled data to be erased.

### 3.4 Data Controller

The natural or legal person or Organization who or which by itself or with the help of others determines the goal of handling data, and makes and executes the decisions regarding the data handling (including the tools used), or contracts for a Data Handler to handle the data in the way in which it specifies.

### 3.5 Data handling

Regardless of the method used, any operation or sum of operations performed on data, especially as regards collection, recording, collating, storing, changing, using, querying, forwarding, publishing, harmonising with other data, locking, erasing and destroying, preventing data from being used further, photographic-, audio-, and/or video-recording, or recording any personal data that can be used to identify someone (such as fingerprints or handprints, DNS samples, iris scans).

### 3.6 Data forwarding

Making the data available to a given authorized third person.

### 3.7 Disclosure

Making the data available to anyone.

### 3.8 Data deletion

Making the data unrecognizable in a way that cannot be reversed;

### 3.9 Locking data

Adding an identifier to the data limiting its further usage, either for a certain period of time or indefinitely.

### 3.10 Data destruction

The total physical destruction of data media devices.

### 3.11 Data processing

The technical execution of the tasks associated with handling the data, regardless of the method or devices used to do so, or the location of the application, as long as the technical tasks are performed on the data.

### 3.12 Data processor

The natural or legal person, or Organization, who or which, based on a contract with the Data Controller as defined by law, processes the data.

### 3.13 Third party

A natural or legal person, or Organization, who or which is different from the Data Subject, the Data controller, and the Data processor.

### 3.14 Third country

All countries which are not members of the European Economic Area.

### 3.15 Cookie

Text file, which is stored through one's Internet browser and stored on one's computer. Its function is to simplify web browsing, and to make it more personal, and with its assistance we store our personal data and our passwords. Using our cookies, targeted/personalized advertising campaigns also become possible to execute.

## 4. Principles used in the course of data-

### processing

Personal data can be used when:

- a) The Data Subject agreed to use of its personal data for one or more specific aims;
- b) The data handling is necessary to complete a contract in which the Data Subject is one of the parties, or

which are required to complete one of the steps requested by the Data Subjects;

- c) the data handling is necessary to protect the legal responsibilities toward the Data Subject;
- d) the data handling is crucial to protect the Data Subject or another natural person;
- e) the data handling is in the public interest or in the exercise of an authority conferred on the data controller;
- f) the data handling is necessary to exercise the legitimate interests of the data controller or a third party, except, if the Data Subject has higher priority interests or natural rights and freedoms that require the protection of such personal data, in particular if the Data Subject is a child.

Personal data may only be handled for a specific purpose, for the exercise of a specific right, or to meet a responsibility. At each point in the data handling, the purpose of the data handling must be followed, and the recording and handling of data must be done honestly and legitimately.

The only personal data which may be handled is data that is essential to the purpose of the data handling, and suitable for meeting that purpose. Personal data may only be handled to the extent and for the duration necessary to meet its purpose.

During data handling, the correctness and completeness of the data must be assured – including ensuring that the data is up to date as required for the data handling, and also ensuring that the Data Subject may only be identified for the minimum time necessary to handle the data. The Data Subject shares responsibility for the data they have provided, its correctness, completeness, and validity. The Organization will not be responsible for the consequences of data incorrectly entered by the Data Subject, even if they could become aware of the incorrectness of the data. If data is entered in the name of another person, the person entering the data is responsible for ensuring they have given a notice corresponding to the present notice, to the Data Subject, and has responsibility for any required proof of the same.

Personal data may only be handled based on prior, informed consent, except if the handling is required by law, or required by the parties' legitimate interests.

The Organization will not publish personal data that it handles, nor share it with any third party except those mentioned previously (Data Processors), and those parties may neither retain the data nor forward it to any third person.

The Data Controller may forward Personal Data to a Third Country to a Data Processor only if the Data Subject explicitly agrees to this. Data forwarding within the European Economic Area, however, will be treated the same as if the data forwarding had occurred within Hungary.

Prior to handling the data of the Data Subject, the Data Subject must be informed whether the data handling is voluntary or required. The Data Subject must be clearly and unambiguously informed in detail about all facts concerning the handling of their data, especially as regards the purpose of the data handling and its legal basis, the person or party authorized to handle the data, the length of time the data will be handled, and who may be informed of the data.

The notice must also include treatment of the rights of the Data Subject as regards data handling, as well as the Data Subject's possibilities for legal redress.

The Organization assures the security of the data, and furthermore takes all technical steps and determines those procedures which are necessary for data protection in harmony with the provisions of the laws set out in section 2.

## 5. [The legal basis for data handling and its purpose.](#)

Data handling is based on the voluntary consent of the Data Subjects. This consent includes agreement to the contents of the data handling notice.

### 5.1 Website visitor data

Purpose of the data handling: to enable the operation of the web site, to monitor its operation, to prevent security incidents, and assess security incidents that have occurred.

Legal basis for data handling: 2001, Hungarian law CVIII – on certain questions in electronic commerce services, and certain aspects connected to providing service within an information society, 13/A. § para. (3)

Type of data handled: date of visit, exact time of visit, web addresses visited on the website, the page visited prior to visiting the website, the IP address of the visitor, the web browser used, and data about the operating system used.

Time the data is erased: 2 years after the date of the visit.

### 5.2 Data recording by external Organizations on the website

The Organization has not authorized any third party to collect information on the website, nor handle any such personal information.

The web analytics Organization is Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043) and is only authorized to view anonymous information not tied to the identity of the visitor. The principles for its data handling policy are available here: <http://www.google.com/intl/hu/privacy/> (<http://www.google.com/intl/hu/privacy/>)

### 5.3 Requested Personal Data

**Purpose of the data handling:**

Job advertisements for positions to be filed.

**Legal basis for data handling:**

The voluntary consent of the Data Subject and their legitimate interests - GDPR article 6. Para. (1). a), f).

**Type of data handled:**

Curriculum Vitae data (name, address, contact, degrees, career information, other information provided by the Data Subject)

**Length of time of data handling:**

Until the position is filled, or until a deletion is requested, or, with consent, for 6 months.

**Consequences if the data were not collected:**

The Data Subject is unable to apply to the advertised job opportunities.

**Purpose of the data handling:**

Handling of personal data for a business purpose.

**Legal basis for data handling:**

Due to legal requirement - GDPR article 6. Para (1) point f)

**Type of data handled:**

Contact information for company representatives (name, address, contact)

**Length of time of data handling:**

Until deletion is requested

**Purpose of the data handling:**

Providing examinations, treatment, and surgery

**Legal basis for data handling:**

Due to legal requirement - GDPR article 6. para. (1), point c); legitimate interest - GDPR article 6. Para. (1), point f); Data Subject voluntary consent GDPR article 6, para. (1), point a)

- Hungarian law 1997, CLIV. regarding health services, para. 136.

- Hungarian law 1997, XLVII. law regarding health services and personal data, its handling and protection

**Type of data handled:**

Personal data of patients (name, address, telephone number, email address, outpatient data sheet. In case of surgery: register of anesthesia, nurse's register, data of preliminary examination, blood work, radiological

pictures, oncotype DX)

**Length of time of data handling:**

15 years

**Data Subject consent has been requested:**

yes

**Consequences if the data were not collected:**

The Data Subject would not be able to use the medical service.

**Purpose of data handling:**

Contact, keeping contact

**Legal basis for data handling:**

Data Subject's voluntary consent - GDPR article 6, para (1) point a)

**Type of data handled:**

Contact information on the website, name e-mail address, telephone, message, as well as any other personal information provided by the Data Subject

**Length of time of data handling:**

2 years from receipt of the data, or until deletion is requested

**Purpose of data handling:**

For examinations and surgery

**Legal basis for data handling:**

By legal requirement - GDPR article 6. para. (1) point c) and by legitimate interest - GDPR article 6. para (1) point f)

- Hungarian law 1997, CLIV. regarding health services, para. 136.

- Hungarian law 1997, XLVII. law regarding health services and personal data, its handling and protection

**Type of data handled:**

Name of family contacts (name, address, contact)

**Length of time of data handling:**

15 years

**6. Use of Cookies on the Organization's web site** What is a cookie?

By Cookies, we mean very small text files which store some information about the website visits, for a certain period of time and for a specific purpose. Upon a repeat visit, the web site is able to recognize the text file, and thereby identify the repeat visitor.

The primary goal of cookies is to make browsing more comfortable and more personalized, since with their help, we can store various personal data and settings. Through the use of cookies, better, more targeted advertising campaigns also become possible.

At the moment our Organization does not use cookies on our web page. (1) Google Analytics. Our web site uses Google Analytics, operated by Google Inc. (address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter Google) for its web analytics service. Google Analytics uses its own cookies – these, too, are small text files stored on the user's computer – in order to analyze the web page usage of users. The information used by these cookies on the present web page ordinarily is transmitted to and stored on Google's servers operating in the United States of America.

Google uses the information it receives, based on our authorization, in order to help analyze usage of the web site, and to prepare summaries of the activity that occurs on our page, and as authorized by us, provides additional Internet-based services to the web site's users. The IP address the browser sends to Google Analytics are stored separately from other data Google stores. By changing the settings in your browser, it is possible to keep cookies from being stored; additionally, at <http://tools.google.com/dlpage/gaoptoutPhhde> a browser extension is available that prevents the data stored in cookies about usage of web sites (including IP address) from being sent to Google, as well as their handling and processing. The general terms and conditions for Google Analytics are available at <http://www.google.com/analytics/terms/hu.html>, and you can read its privacy policy here: <http://www.google.com/intl/de/analytics/privacyoverview.html>

(2) Google Adwords

Our web site makes use of the Google company's "Google AdWords" analytics service, and as part of this, its conversion tracking service. Google AdWords places a conversion cookie on the user's hard drive whenever the user clicks an advertisement served by Google. These cookies expire after 30 days, and cannot be used to identify someone personally. When visiting some of our web pages, Google and UOIEA Zrt. may observe whether you reached our web site by clicking an advertisement.

Through the data gathered from use of these conversion cookies, Google gives statistical reports to users of its AdWords program who check conversion rates. These statistics show how many people in total clicked on advertisements served by Google, and how many people opened our web site while having a valid conversion cookie. We do not receive any data that can identify visitors personally. We are not able to combine this data in any way so as to draw a conclusion about a given user.

#### 7. Parties who may receive data, data forwarding, Data Processing

The data is primarily processed by the Organization and by contractors who are in a contractual relationship with the Organization for data processing purposes (recorded Third Parties, and those mentioned in the Data inventory). The Organization's employees are also authorized to see the data, however, they may not publish it, nor share it with any third party. In order to meet a specific purpose, the Organization may make use of a Data Processor.

All other forwarding of the Data Subject's personal data may take place only as required by law, or with the Data Subject's agreement.

#### 8. Modifications of the data handling policy

The Organization reserves the right to modify this data handling policy unilaterally, by giving prior notice to the users. By using our service following notification of a modification in the policy, you accept the modified data handling policy.

#### 9. Users' rights regarding handling of their personal data

Data Subjects may request information regarding the handling of their personal data, as well as correction of their personal data or – except under certain legal exceptions – the deletion of their personal data. Upon the Data Subject's request, the Organization must inform the Data Subject about the data that it handles about the Data Subject, the purpose of the data handling, its legal basis, duration of time, the name of the data processor and its address (headquarters), and activity related to data handling, as well as which other parties receive or have received the data and for what purpose. The data controller must give this information as soon as possible after receiving the request, but at the latest within 30 days, in clear, written form. This information must be free. The information may be requested by e-mail at the [uoieazrt@gmail.com](mailto:uoieazrt@gmail.com) address, and the Data Subject will receive an answer to such e-mail within 8 workdays.

The Data Subject may object to treatment of its personal data, under the contact listed in point 14 below, if the Data Subject objects to the legality of the data handling; in this case the Organization must give the Data Subject written notification of its decision regarding the objection. If the Data Subject disagrees with the decision, the Data Subject may turn to the legal system to further exercise its rights.

#### 10. Possibilities for legal remedy

The Data Subject may object to treatment of its personal data:

- a. if handling the personal data is necessary, or forwarding it to a third party is necessary, only in order to meet the legal obligations of the Data Controller;
- b. if the personal data usage or forwarding occurs for a direct business purpose, public opinion survey, or scientific research; and
- c. in other cases as defined by law.

The Data Controller shall examine the objection in the shortest possible time, but at the latest within 15 days from receiving the objection, must make a decision about the validity of the objection, and must inform the person making the objection in writing. Insofar as the Organization determines that the objection of the Data Subject is valid, it will stop the data handling – including further data collection and data forwarding – and lock the data, and inform all parties about the objection, and the actions taken in response to it, to whom it had previously forwarded Personal Data and who must now take some action in response to the objection.

If the Data Subject does not agree to the decision regarding its objection, or if the data controller fails to respond within 15 days, the Data Subject may turn to the court system after receiving the decision, or within 30 days after the last day of the deadline for response.

#### 11. Data controller's statement

The Data Controller represents and warrants that it has read and agrees to be bound by the contents of this notice, and that its data handling in connection with its service shall meet the provisions of this notice.

#### 12. Legal remedy

Data Subjects have the following rights and legal remedies in connection with data handling: the Data Subject may request information from the Organization at its mailing or e-mail address (mailing address: 1135 Budapest, Szegedi út 56. E-mail: [uoieazrt@gmail.com](mailto:uoieazrt@gmail.com)) about its handling of personal data; in response the Organization gives information about the data that it handles, the purpose of the data handling, its legal basis, duration of time, and any Data Processors, their legal basis, and addressee (Infotv.14.§).

The Organization is required to give the information within 25 days, and may only deny it on some legal basis.

The Data Subject may turn to the NAIH with its legal remedy requests: Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information) 1125 Budapest, Szilágyi Erzsébet fasor 22/c Telephone:+36 (1) 391-1400 E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)