

# **Privacy Policy**

The purpose of Kliinik 32 OÜ, Kliinik 32 Labor OÜ and Kliinik 32 3D OÜ (hereinafter jointly referred to as Kliinik 32) is to ensure the security and processing of its patients' and its customers' personal data in accordance with the terms and conditions set out in legal acts and in the contract for the provision of healthcare services.

### Collection and processing of personal data

Kliinik 32 collects and processes your personal data in order to provide dental services and to perform other obligations arising from the contract for the provision of healthcare services and the legislation, and in order to execute its rights thereunder. We may collect personal data directly from the patient, when you come to the clinic, call us or send us an e-mail. We may also collect personal data from third parties for the purpose of providing healthcare services, performing our other contractual obligations or protecting our own rights, by submitting requests in electronic health (e-Health) information systems and, if necessary, in other public registers. Kliinik 32 can also collect your personal data when you apply for a job with us. If you visit our website and agree to the use of cookies, Kliinik 32 may collect information about the online behaviour of visitors on our website, but do not personalise such data.

In addition, Kliinik 32 uses security cameras for the surveillance of its premises, in the field of vision of which you may appear, but we do not personalise such data. We will store the information provided through the means of the communication (e-mail, helpline, chatbot on the website, etc.), that we use to perform the contract concluded with you, to ensure the performance of the contract, and to improve the quality of our customer service. We may send you notices with the purpose of the performance of the contract concluded with us and from the receipt of which you can waive by notifying us via the link included in the notice.

Kliinik 32 OÜ collects and processes the following personal data of patients:

- When registering for a visit, the patient's contact information (name, personal identification code, place of residence, email address, phone number);
- When arriving to receive a treatment for the first time, the information provided by the patient in the pre-information form about the patient's general health status, complaints, and the reasons for coming to get a treatment;

- The data included in the dental card of the patient that we collect and store during the provision of the treatment;
- The patient's health information provided by the patient himself/herself (including, but not limited to, information provided by other healthcare service providers, etc.);
- Billing information regarding your payment for the medical services;
- Other information you have provided to us by any means of communication.

In addition, Kliinik 32 OÜ may process the previously pseudonymised data (non-personalised treatment descriptions, photos that do not allow the identification of the patient, etc.) for developing dentistry, for academic purposes or to serve as therapeutic examples on our website. If you do not want your information to be used for such purposes in a non-personalised form, please let us know.

Kliinik 32 3D OÜ may collect your personal data (e.g. your name, personal identification code, date of birth, e-mail, phone number, dietary preferences, etc.) when you register for conferences, seminars and trainings organised by Kliinik 32 3D, with the aim of providing you with further training opportunities in areas related to dentistry.

### Consent for the processing of personal data and the deletion of data

You have given your consent for the collection and processing of data by yourself or the person whose legal representative you are (e.g. a child or other person with restricted legal capacity) by concluding a contract for the provision of healthcare services with Kliinik 32 OÜ. You have given Kliinik 32 3D OÜ your consent for the collection and processing of your personal data, when you register for a conference, seminar or training.

Kliinik 32 shall not process your personal data for longer than necessary. In each particular case, the data retention period depends on the contract concluded, the legitimate interest of Kliinik 32 and the statutory basis (retention of health records, retention of accounting documentation, expiration of legal requirements, et cetera).

## **Processors of personal data**

Kliinik 32 OÜ may transfer your personal data and authorise the following persons to process your personal data:

- Kliinik 32 Labor OÜ for the preparation of dental prostheses;
- Credit and financial institutions, if you express the wish for the financing of the healthcare services by third parties;
- Insurers, if it is necessary for the financing of healthcare services provided to you;
- Authorities (courts, bailiffs, law enforcement authorities, tax authorities, etc.);

- Support service providers (accounting service providers, attorneys, debt collectors, etc.);
- National health (e-Health) information systems;
- Other partners of Kliinik 32 OÜ whose services are directly necessary for the performance of the healthcare contract concluded with you.

Kliinik 32 3D can transfer your data to the providers of conference services and other related services, and to the Estonian Dental Association for issuing training certificates.

In the case that Kliinik 32 involves third parties in the processing of your data, such third parties have confirmed with relevant contracts that they implement adequate technical and organisational security measures and follow the legal acts regulating the protection of personal data, including the General Data Protection Regulation, in order to ensure the necessary protection of your data.

### Right to access the data and other rights

You have the right to access the data we have collected about you. To do this, we ask you to submit a request for information that we will respond to as soon as possible, but not later than within one month.

We refuse to comply your request to access data, if it may:

- damage the rights and freedoms of other parties;
- undermine national security;
- prevent or impede the prevention, detection or prosecution of a crime or the execution of sentences.

#### Additionally, you have the right to:

- request for us to correct inaccurate personal data;
- obtain information about yourself in a structured, commonly used and machine-readable format, and to transmit it to another service provider under certain circumstances;
- take back your consent in the case of personal data processing based on your consent (in particular the consent given for direct marketing purposes);
- demand the restriction of processing or the deletion of personal data if this is not in conflict with the purpose and performance of the contract entered into or the performance of obligations arising from the law.

If you have any questions about the processing of your personal data in Kliinik 32, kindly send us a mail to andmekaitse@kliinik32.ee.

If you find that the processing of your personal data violates your rights, you can also turn to the Estonian Data Protection Inspectorate (Väike-Ameerika 19, Tallinn 10129, email address <a href="mailto:info@aki.ee">info@aki.ee</a>) or the court.