

## Protypo Dialysis Center of Pella Privacy Policy

### **1.- Introduction**

Protecting the data is of primary concern to Protypo Dialysis Center of Pella (hereinafter Center).

In order to success the above, the Center applies all modern and appropriate for the purpose of processing technical and organizational measures, the response of which is checked at regular intervals.

This Policy informs data subjects about the data that the Center processes due to its business activity (hardcopy and online) in accordance with Regulation EU 2016/679 (hereinafter Regulation) and describes how the Center collects, uses and protects your personal data as well as your rights.

### **2.- Definitions**

**PERSONAL DATA** means any information relating to an identified or identifiable natural person (**'data subject'**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number.

**SPECIAL CATEGORIES OF PERSONAL DATA (sensitive data)** means the data referring to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or data concerning a natural person's sex life or sexual orientation.

**DATA CONCERNING HEALTH** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.

**PROCESSING** means collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination.

**CONTROLLER** means the natural or legal person, public authority, agency or other body which determines the purposes and means of the processing of personal data.

**PROCESSOR** means the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**RECIPIENT** means the natural or legal person, public authority, agency or another body, to which the personal data are disclosed.

**SUPERVISORY AUTHORITY** means an independent public authority which is established by each Member State. In Greece is the Hellenic Data Protection Authority (HDPA).

**CONSENT OF THE DATA SUBJECT** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

### **3.- Principles relating to processing of personal data**

According to the Regulation, every company shall

- collect the personal data lawfulness and fairness
- keep only the needed data
- keep data secure
- store data only for as long as necessary to fulfill the respective purpose for which they are collected and processed
- inform data subjects, when necessary
- use appropriate technical and organizational measures in order to ensure appropriate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage and
- be able to demonstrate its compliance with Regulation.

### **4.- The purpose of the Policy**

The purpose of this Policy is to provide you with information concerning the collection, procession of personal data; which personal data we collect, for how long and for what purpose.

With regard to our employees (candidates, staff members and former employees), the Center applies a separate policy (EMPLOYEES' DATA PRIVACY POLICY).

The Center reserves the right to update, modify and change this Policy unilaterally and without prior notice.

### **5.- Privacy Policy**

## A) The legal basis for the processing

- The consent of the data subject,
- The compliance of the Center with a legal obligation (ie Code of medical ethics),
- The fulfilment of our contractual obligations,
- The proper operation of our Center,
- The satisfaction of data subjects' information and communication requests.
- The protection of our staff, facilities and equipment,
- The fulfillment of our contractual obligations towards third parties, such as manufacturers of products and
- The protection of the data subject.

## B) What Personal data we collect and how we process them

The Personal data that the Center processes:

### **Patients**

- Identity and demographic data, such as name, surname, father's name, date of birth or age, gender, identification number, permanent address, telephone number, VAT, SSN (Social Security number), insurance fund)
- Contact details (permanent address, telephone number, e- mail)
- Data of third parties (such as family member) for the receipt of medical results (name, telephone, e-mail) or for the information about the patient's progress.
- Data concerning health for medical services provided by our Center (such as doctor referrals, medicine/treatment, medical and family history, medical opinions and conclusions, invalidity or incapacity, surgical procedures), data concerning health for medical services not provided by our Center, but reported to us directly by the patient or a third party and data concerning health that our Center must keep in order to properly provide

properly its services to the patient and to protect our patients and staff from any infection.

- Biological samples and genetic data for the purpose of their laboratory examination
- Information given directly by the patient or his / her representative about the payment of the Center (such as a bank card).

### **Visitors / users of «[www.nefrologiko.gr](http://www.nefrologiko.gr)»**

- Browsing details and Internet Protocol (IP) address visitor's device while browsing our website.

### **Suppliers or Externals**

- Name & Surname or name of the company
- contact address
- Telephone number
- VAT
- FAX
- E-mail
- Contact persons

### **C) Processing purpose**

- Provision of health services to the public; the Center may process the data of subjects for the dialysis scheduling, the delivery of medical examination results and the identification of the data subject
- Information, promotion and commercial communication of our products and services.
- Execution of an order or contract.
- Fulfillment of our legal obligations towards the Social Security Organizations, Private or Public Hospitals and Clinics.

- Receiving directly from the EOPPY or the insurance funds the payment of the services provided.
- Our compliance with legislation (eg Code of medical ethics).
- Compliance with manufacturer's requirements.
- Fulfillment of our obligations.
- Fulfillment of our goals.
- Reply to Supplier, Customer (including Patient) and Partner.

In all cases, except in cases where public services disclose data to us, personal data are submitted to our Center voluntarily by the subjects themselves or through their representatives.

#### D) Period of time for which your data is stored

The data will be only stored for as long as necessary to fulfill the respective purpose for which we collect them in accordance with the Regulation.

#### E) How our Center processes your personal data

The Center collects only the necessary personal data, as appropriate. Furthermore, the processing of the data is done both on printed and electronic means and is recorded in the Center's corporate system in accordance with applicable law - including provisions on data security and confidentiality and in accordance with the principles of fairness and lawful processing.

#### F) How our Center discloses your personal data

Your personal data are processed by authorised officials. Our Center further may share your data with other partners, as Doctors, law firm, Notified Bodies, or public service and information systems, as EOF, ERGANI, banks and insurance funds, as part of our compliance with external and internal regulations or where otherwise required by law. In the context of the Center's business activity, personal data may be disclosed to suppliers or externals of the Center. However, in this case, legal or natural person will process such data only for the purpose of providing the services to the Center and not for their own benefit, acting as processors and having committed themselves with a Statement of Confidentiality.

Patients' personal data are shared with others nephrology centers or kidney units, if the patient has given us order for the portability of his data.

Exceptionally, personal data may be disclosed to third parties (police and prosecuting authorities), only if there is a statutory obligation or by a judicial authority.

#### G) Transfers of personal data to third countries or international organisations

The Center doesn't transfer personal data to third countries or international organisations. In any case of transmission outside of the European Economic Area, the Center will obey the Regulation.

#### **6.- Rights of the data subject**

The data subject has the right to obtain from the Center confirmation as to whether or not his or her personal data are being processed by this company and have access to them.

The data subject may at any time contact the Center, and in particular the Data Protection Officer (telephone number: +30 210 3645691), to exercise the rights provided for in the General Data Protection Regulation (Articles 15-22), such as access to personal data (in order to know the purposes of the processing and the recipients of the data), the verification of the content, its origin, accuracy and location, the obtaining of a copy, updating or modification of the data, in the cases stipulated by the law, the request for definition of the data, the request for deletion of data etc. These rights are, in principle, exercised at no cost to the underlying.

In addition, if you (the data subject) have given explicit consent to the processing of your personal data for one or more specified purposes, you may withdraw your consent at any time by a simple revocation statement (e-mail: [aatmatzaki@samartzislaw.gr](mailto:aatmatzaki@samartzislaw.gr) / [fdionysia@gmail.com](mailto:fdionysia@gmail.com), contact phone number: +30 2103645691, address: 1st km Old National Road Skydra - Edessa, Mavrovouni, Skydra Pella - Attn: DPO).

Finally, at any time you have the right to submit directly a complaint to the Hellenic Data Protection Authority (HDPa) ([www.dpa.gr](http://www.dpa.gr)).

*We reserve the right, in our sole direction, to modify or update this Policy at any time.*

*Last update: May 2024*