

# E-Medlab Hungary Kft. INFORMATION ON THE PROCESSING OF PERSONAL DATA

v2.

E-Medlab Hungary Kft, as Data Controller, commits itself to observe the contents of this legal statement. It undertakes to ensure that all data processing connected to its activity will fulfil the requirements that are defined in this information document and in the effective legislation.

The data protection principles that arise in connection with data processing implemented by SCN4ALL, the product of E-Medlab Hungary Kft are continuously available at [scn4all.com/privacy\\_policy](http://scn4all.com/privacy_policy).

E-Medlab Hungary Kft reserves itself the right to change this information document at any time. Naturally it will notify its clients about the changes taking place that will involve them.

E-Medlab Hungary Kft is committed to protect the personal data of its clients and partners, and it considers respecting the information self-disposition right of its clients to be of outstanding importance.

E-Medlab Hungary Kft processes the personal data confidentially and it introduces all those security, technical and organisational measures that retain and guarantee the security of the data.

Budapest, 2021-01-13

On behalf of the management of E-Medlab Hungary Kft:

Dr. Sándor Kulin  
Executive

Contents

|   |           |
|---|-----------|
| <b>Purpose of this information document</b>   | <b>3</b>  |
| <b>Name of Data Controller</b>  | <b>3</b>  |
| <b>List of the data processing related regulations</b>  | <b>3</b>  |
| <b>Explanation of data processing related specific terms</b>  | <b>4</b>  |
| <b>Identification of the group of personal data processed</b>   | <b>4</b>  |
| <b>Consequences of Data Subject refusing the data providing obligation</b>                                    | <b>5</b>  |
| <b>Automated decision making or profiling</b>   | <b>5</b>  |
| <b>Data forwarding to third countries or to international organisations</b>                                   | <b>5</b>  |
| <b>Research and statistical purpose utilisation of the data collected or processed during data processing</b> | <b>5</b>  |
| <b>Possibility of getting acquainted with the personal data processed</b>                                     | <b>6</b>  |
| <b>Data security related measures</b>   | <b>7</b>  |
| <b>Rights of the data subjects</b>  | <b>7</b>  |
| <i>General rules concerning the exercising of the rights of the data subject clients</i>                      | <i>7</i>  |
| <i>The right of data subject to withdraw its consent given to data processing</i>                             | <i>8</i>  |
| <i>The right of access to the personal data that refer to the data subject</i>                                | <i>10</i> |
| <i>The right to have the personal data concerning the data subject be rectified</i>                           | <i>11</i> |
| <i>The right to have the personal data concerning the data subject erased</i>                                 | <i>11</i> |
| <i>The right to restrict the personal data that refer to the data subject</i>                                 | <i>12</i> |
| <i>Right to the portability of the personal data of the data subject</i>                                      | <i>13</i> |
| <i>The right to object against the processing of the personal data of the data subject</i>                    | <i>14</i> |
| <i>The right of the data subject to complain and to legal remediation</i>                                     | <i>16</i> |
| <b>Register of the data processed</b>   | <b>17</b> |
| <i>Data group „A” – Patient Monitor data (data of measurement services)</i>                                   | <i>17</i> |

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

### 1 Purpose of this information document

Data Controller provides the information that is included in this document for the data subjects in connection with the processing of personal data based on Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as: GDPR).

### 2 Name of Data Controller

|                  | Data Controller  | Data Protection Entity   |
|------------------|--|--|
| Name:            | E-Medlab Hungary Kft.                                  | VisionLogic Kft.   |
| Postal address:  | 1036 Budapest, Bécsi út 85. 3.emelet                   | 1195 Budapest, Jókai utca 30.  |
| E-mail address:  | <a href="mailto:info@scn4all.com">info@scn4all.com</a> | <a href="mailto:hivatalos@visionlogic.hu">hivatalos@visionlogic.hu</a> |
| Phone/Fax:       | 30-922-6206  | 70-332-4559  |
| Website:         | <a href="http://scn4all.com">scn4all.com</a>           | <a href="http://www.visionlogic.hu">http://www.visionlogic.hu</a>      |
| Tax Number:      | 26577414-2-41  | 25971774-2-43  |
| Registered seat: | 1036 Budapest, Bécsi út 85. 3.emelet                   | 1195 Budapest, Jókai utca 30.  |

|                  | Data Processor<br>(IT developer and operator)                           | Data Processor<br>(Developer and Operator)                      |
|------------------|---|---|
| Name:            | Tappointment Kft.   | e-Med4All Europe Kft.   |
| Postal address:  | 1077 Budapest, Wesselényi utca 16, C épület, 3.emelet                   | 1036 Budapest, Bécsi út 85. 3.emelet                            |
| E-mail address:  | <a href="mailto:hello@tappointment.com">hello@tappointment.com</a>      | <a href="mailto:emed4all@gmail.com">emed4all@gmail.com</a>      |
| Phone/Fax:       | 20-973-8095   | 30-922-6206   |
| Phone site:      | <a href="https://www.tappointment.com">https://www.tappointment.com</a> | <a href="https://www.emed4all.com">https://www.emed4all.com</a> |
| Registered seat: | 8000 Székesfehérvár, Király sor 30.                                     | 1036 Budapest, Bécsi út 85. 3.emelet                            |

### 3 List of the data processing related regulations

- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on

the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation – hereinafter referred to as: GDPR)

- Act CXII of year 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv)
- Act XLVII of year 1997 on the Processing and Protection of Medical and Other Related Personal Data
- Regulation 62/1997. (XII. 21.) NM on specific issues of processing health care and related personal data
- Act CLV of year 1997 on consumer protection (Fgytv)
- Act CVIII of year 2001 on certain issues of electronic commerce services and information society services. (Eker. tv.)
- Act XLVIII of year 2008 on Essential Conditions of and Certain Limitations to Business Advertising Activities (hereinafter referred to as: Grtv)
- Act CXIX of year 1995 on the Use of Name and Address Data Serving the Purposes of Research and Direct Marketing

#### 4 Explanation of data processing related specific terms

The definition of “**personal data**” according to the GDPR is the following:

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 (*e.g. by a name, an identification number, location data, an online identifier or by one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*).

#### 5 Identification of the group of personal data processed

Data Controller has to prepare a data inventory concerning the data that are possessed by it in connection with its activity, in which it has to regularly review the group of data processed and the related liabilities and rights. It has to regularly update its data register; it has to keep it up-to-date in order to be able to extend its data protection to the entire scope of the processed data.

Data Controller provides information on the scope of data that are processed by it on the data sheets that are detailed in tables given *in Point 13* on the day the document containing this information is published.

##### **Data indicated on the data sheets, presented by data groups:**

- Purpose of data processing
- Group of data recorded
- Category
- Reason of recording
- Legal basis of data processing
- Source of the data

- o Data retention related periods (times of retention, anonymisation, deletion)
- o Data concerning possible data forwarding

## 6 Consequences of Data Subject refusing the data providing obligation

***Providing the personal data processed depends on the free decision of the data subject according to the primary rule.***

If providing the personal data requested is based on the legislation or contractual obligation or it is a prerequisite of signing a contract, the data subject may not avoid giving the personal data required. If it neglects to do so that may lead to the following legal consequences:

- in the case of data requests made for the purpose of signing a contract: failure of signing the contract
- in the case of data requests made for secure identification purposes: restriction of entry, exclusion
- in the case of data requests made for diagnostic purposes: failure of the full exploitability of the offered service level
- in the case of data requests made for the purpose of performing legal obligations: performing the legal obligation becomes impossible

## 7 Automated decision making or profiling

|   |                   |
|---|-------------------|
| ● Data controller applies automated decision making or profiling in the course of its activity:             | it does not apply |
| o Information concerning the applied logics, in detail:   | it does not apply |
| ● The importance and the consequence of the applied automated activity from the aspect of the data subject: | it does not apply |

## 8 Data forwarding to third countries or to international organisations

|  |              |
|--|--------------|
| o Name of third country or international organisation:                                       | not relevant |
| o Compliance resolution of the EU Commission, in the lack of this marking of the guarantees: | not relevant |
| o Mandatory company rule:  | not relevant |
| o Deviation referring to special situations:   | not relevant |

## 9 Research and statistical purpose utilisation of the data collected or processed during data processing

Data Controller and E-Med4All Europe Kft, as Data Processor processes the data only in anonymized form in the course of its statistical or research purpose activity.

Data Controller and E-Med4All Europe Kft, as Data Processor produces the data that are to be used for statistical or research purposes from data that are processed by it in such a manner that the final anonym character of these data are ensured.

Anonym information is information, which cannot be connected to the identified or identifiable natural person. Moreover, the (original) connection of the anonymized data produced this way to the natural persons may not be restorable at all.

The anonymized data are already not personal data; therefore, the Data Controller already does not apply in respect of these data its rules that refer to the protection of personal data.

## 10 Possibility of getting acquainted with the personal data processed

As the primary rule the employees of Data Controller may get acquainted with the personal data of the data subject in connection with implementing their work related tasks up to the extent needed for implementing their work:

- During registration related administration.
- During matching the physicians and the patients.
- In connection with administration that is connected to the payment of the service fees.
- During picking up contact as needed with buyers using the service.
- During the technical administration of the system (in the role of application administrator)

Data Controller, during providing the service, also guarantees the protection of the elements and records of the database that contains personal data that are stored in the IT infrastructure supporting the service, and it establishes its business logics accordingly with supporting the restriction of the possibility of getting acquainted with the personal data to the required and sufficient extent to the group of those authorised to learn them. It implements the hierarchical user and right management within its infrastructure accordingly. Due to this:

- User of an Admin Authorisation Level may learn the personal and diagnostic data of all other users registered in the system
- User of a Physician Authorisation Level may learn the personal data of those Registered Users and Patients, who selected them as their physicians.
- The Registered Users may learn only their own measurement and diagnostic data.

Data Controller, in the course of providing the service, ensures in its IT system – by matching the patient and physician relation – for the physician selected by the patient involved the possibility of learning the data that are given by the data subject, up to the extent that is needed for diagnostics. In the lack of this a physician selected by the patient involved, Data Controller would be unable to carry out the diagnostics and to evaluate the data.

Data Controller will hand over the personal data of the data subject only in exceptional cases to other state organisations. Thus, for example:

- If a court procedure is started in respect of a legal dispute that is in process between the data subject and the Data Controller, and it is necessary to hand over for the acting court the documents that contain the personal data of the data subject.
- In the case of a request submitted by the police – if the investigating authority, in the possession of its legal authorisation, requests the personal data of the data subject in a justified manner in the course of a procedure – Data Controller forwards the personal data of the data subject up to the extent that is needed for the investigation.
- The lawyer taking care of the legal representation of Data Controller may also learn the personal data, if there is a legal dispute between the data subject and the Data Controller.

## 11 Data security related measures

Data Controller stores the data that are provided by the data subject in the infrastructure of Data Controller that is operated on its IT cloud platform, and in case it is necessary to prepare extracts from these, it stores the extracts at its registered seat or its registered premises.

Storing the data and operating the service components that are involved in data flow during the provision of the service is done in the European Union service region of Amazon Web Services (hereinafter referred to as AWS).

Data Controller uses the services of the data processors that are given in Point 2 for processing the personal data of the data subject.

Data Controller with appropriate information security measures ensures the protection of the personal data of the data subject among others against unauthorised access or their unauthorised modification.

- Data Controller or the Data Processors(s) assigned by it log the fact, the time and the initiator of access to the personal data that are stored in the electronic systems of Data Controller, and through this it may be always identified who, when accessed what personal data.
- Data Controller with appropriate technical and organisation measures ensures that the personal data may not be become accessible by unauthorised persons.

## 12 Rights of the data subjects

### 12.1 General rules concerning the exercising of the rights of the data subject clients

- a) Data Controller without any unjustified delay, but at most within one month after receiving the request will inform the data subject client about the measures that were made in connection with its request.

- b) If needed – with taking into consideration the complexity of the request and the number of requests, this deadline may be extended with an additional two months. Data Controller will inform the requesting, initiating client about the extension of the deadline with indicating the reasons of the delay within one month after receiving the request.
- c) If the requesting, initiating client submitted the request electronically, it will receive the information as far as possible also electronically, except, if the requesting, initiating party requests it otherwise.
- d) Data Controller ensures the information and the measure for the requesting, initiating party free of charge as default. If the request of the requesting, initiating client is clearly unfounded – especially due to the repeated character of the request – or excessive, Data Controller, with taking into consideration the administrative costs that are involved in providing the information requested or introducing the measure requested:
  - o may charge a fee of a reasonable amount, or
  - o may refuse to introduce any measures that would be based on the request.Proving the clearly unfounded or excessive character of the request is the task of Data Processor.
- e) If Data Controller has well-founded doubts about the person of the natural person submitting the request, it may request additional information required for identifying the personal identity of the requesting, initiating person.

## 12.2 The right of data subject to withdraw its consent given to data processing

Data Controller – in connection with the provision of the service records, stores and processes data on its clients (the data subjects) with the consent of the data subjects. The client in connection with the data processed is entitled to withdraw at any time its data controlling related consent it gave prior to the recording of his or her data.

The withdrawal of the consent has no impact on the lawfulness of data processing that was carried out based on the consent prior to its withdrawal, therefore the further data processing of the data given by the data subject, and which exist in a lawful and consent-based self-disposing manner at Data Controller will be implemented in the manner that may be learnt from the information document on data protection.

Data subject is entitled to issue its withdrawal in the same simple manner as it has given it, therefore if he or she gave his or her consent

- in a paper based form to Data Controller, then it may withdraw it with a written paper-based withdrawal statement submitted to the same place,
- if he or she issued it in the course of the electronic client registration process, he or she may withdraw it through the electronic interface after logging in to the electronic system and his or her identification.

Data Controller also ensures the possibility of initiating the process by submitting the **consent withdrawal request** at the info@scn4all.com email address for those of its clients, who are restricted in any manner in respect of logging in through the electronic interface. After initiating the process, Data Controller identifies the requestor and subsequently it



implements its tasks that are connected to the consent withdrawal of the entitled data subject.

Based on **Section 7, paragraph (3) of the GDPR, the data subject is entitled to withdraw at any time his or her consent that was given for the processing of his or her personal data**, according to the following:

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. It shall be as easy to withdraw as to give consent.

### 12.3 The right of access to the personal data that refer to the data subject

Data Controller stores and processes data about its clients (data subjects) in connection with the provision of the service. Client is entitled to request and receive information in connection with the processed data. Data Controller presents in this information document the data it processes in the course of its activity, the manner it gets these data and the deadline by which it anonymizes or erases the data of the data subject in its system.

**Requesting any information** in connection with the processed data may be initiated by the client at the [info@scn4all.com](mailto:info@scn4all.com) email address. Following this request, Data Controller will carry out the identification of the requester and subsequently it will implement the data rectification request of the entitled data subject.

Based on **Section 15 of GDPR, data subject may request access to the personal data that refer to him or her**, as follows:

- (1) The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
  - a) the purposes of the processing;
  - b) the categories of personal data concerned;
  - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
  - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  - e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
  - f) the right to lodge a complaint with a supervisory authority;
  - g) where the personal data are not collected from the data subject, any available information as to their source;
  - h) the existence of automated decision-making, including profiling, referred to and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- (2) The controller shall provide a copy of the personal data undergoing processing for the data subject. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

## 12.4 The right to have the personal data concerning the data subject be rectified

Data Controller – in connection with providing the service – in respect of the data stored and processed about its clients (the data subjects), ensures for the data subjects the possibility of rectifying the data that are stored about them.

The client may **request the rectification** concerning the processed data at the info@scn4all.com email address. Following this request, Data Controller will identify the requestor and subsequently it will carry out the data rectification request of the entitled data subject.

Data Controller shall provide information to the data subject in respect of each rectification request about the measure introduced (in line with Section 19 of the *GDPR*).

Based on **Section 16 of the GDPR, the data subject is entitled to ask the rectification of the personal data referring to him or her from the Data Controller.**

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

**Notification obligation regarding rectification or erasure of personal data or restriction of processing, based on Section 19 of the GDPR**

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

## 12.5 The right to have the personal data concerning the data subject erased

Data Controller – in connection with the provision of the service – in respect of the data that are stored and processed in respect of its clients (data subjects), ensures the possibility of having the data stored about them erased. The data erasing request have to be justified by the data subject. The reason provided is reviewed by Data Controller, and if it does not belong under the effect of Section 17 (3) of the *GDPR*, Data Controller will implement the request. In connection with each data erasure request – independently of its positive or negative result – Data Controller shall inform data subject about the measures it introduced (according to Section 19 of the *GDPR*).

A **data erasure request** initiated by a client in connection with the processed data may be initiated at the info@scn4all.com email address. After submitting the request, Data Controller will carry out the identification of the requestor, the reviewing of the reasoning provided, and subsequently it will decide on implementing the request, then depending on its decision it will carry out its erasing and information providing related tasks.

Based om **Section 17 of the GDPR, the data subject is entitled to request from Data Controller the erasure of personal data that refers to him or her, as follows:**

(1) The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- c) the data subject objected to data processing made based on public interest, or in the interest of exercising a public authority authorisation, or in the justified interest of data processor (third party), and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing of data done in the interest of direct marketing;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law (Hungarian law) to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society related services.

(2) Where the controller has made the personal data public and is obliged pursuant to paragraph (1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

(3) The restriction of the erasure right of Data Subject may take place only if the following exceptions stipulated by the GDPR exist, that is, whenever the above reasons exist the further retention of the personal data is deemed to be lawful in these cases:

- a) exercising the right of freedom to express the opinion or to obtain information or
- b) fulfilling any legal obligation, or
- c) implementing a task done for public interest, or
- d) due to exercising an official authority vested into the data controller, or
- e) public interest involving the area of public healthcare, or
- f) due to archiving made for public interest, or
- g) due to scientific or historic research purpose or for statistical purpose. or
- h) it is necessary for presenting, enforcing or protecting legal claims.

## 12.6 The right to restrict the personal data that refer to the data subject

Data Controller – in connection with the service provided – in respect of the data that are stored and processed in respect of its clients (data subjects), ensures for the data subjects that they may request the restriction of the processing of data that are stored about them. The request targeting the restriction of data processing has to be justified by the data subject. Data Controller shall examine the reason, and if it fulfils any of the requirements that correspond to the contents of Section 18 (1) of the GDPR, it will execute the request. Data Controller will inform the data subject about the measures it introduced concerning each restriction request – independently of its positive or negative outcome (according to Section 19 of the *GDPR* 19).

It is possible to initiate a **restriction request** by the client concerning the processed data at the [info@scn4all.com](mailto:info@scn4all.com) email address. Upon the submission of this request, Data Controller will identify the requester, it will review the reason, and subsequently it will decide implementation, then depending on its decision it will carry out the required restriction and information providing related tasks.

Based on **Section 18 of the GDPR, data subject is entitled to request from Data Controller the restriction of the processing of personal data that refer to him or her**, as follows:

(1) The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- d) the data subject objected to data processing made due to public interest, or in the interest of exercising a public authority authorisation, or in the justified interest of data processor (third party), pending the verification whether the legitimate grounds of the controller override those of the data subject.

(2) Where processing has been restricted under the above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

(3) A data subject who has obtained restriction of processing pursuant to paragraph (1) shall be informed by the controller before the restriction of processing is lifted.

## 12.7 Right to the portability of the personal data of the data subject

The user registered in the Electronic system is entitled in respect of the data referring to him or her and stored in the system to use his or her personal data made available to Data Controller, to receive them in a format that is widely used and which is readable by computer, moreover, he is entitled to forward these data to another data controller.

Client may initiate his or her ***data moving related request*** at the [info@scn4all.com](mailto:info@scn4all.com) email address.

During exercising the data portability Subscriber is entitled to request the direct forwarding of the personal data between the data controllers, if it is technically feasible.

It is possible to initiate a **restriction request** by the client concerning the processed data at the [info@scn4all.com](mailto:info@scn4all.com) email address. Upon the submission of this request, Data Controller will identify the requester, it will review the reason, and subsequently it will decide implementation, then depending on its decision it will carry out the required restriction and information providing related tasks.

Based on **Section 20 of the GDPR**, the data subject is entitled to the portability of the personal data that refer to him as follows:

(1) The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the legal basis of data processing is the consent of the data subject or the performance of a contract signed with the data subject
- b) and the processing is carried out by automated means.

(2) In exercising his or her right to data portability the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

(3) The exercise of the right to portability may not prejudice the right to erasure. That right to portability shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

(4) The right shall not adversely affect the rights and freedoms of others.

## 12.8 The right to object against the processing of the personal data of the data subject

In respect of the data that are stored and processed by Data Controller – in connection with the provision of the service – concerning its clients (data subjects), Data Controller ensures for the data subjects the right to object against the processing of the data that are stored about them and to request the termination of further data processing concerning their data. The request targeting the restriction of data processing has to be justified by the data subject. Data Controller will examine the reason provided and if it is unable to prove that according to the contents of Section 21 (1) of the GDPR the complained data processing is justified by a compelling lawful reason, it will terminate further data processing concerning the data subject.

In respect of each objection – independently of its positive or negative judgement – Data Controller will provide information to the data subject on the measures introduced (according to Section 19 of the *GDPR*).

It is possible to initiate an **objection request** by the client concerning the processed data at the [info@scn4all.com](mailto:info@scn4all.com) email address. Upon submitting this request, Data Controller will identify the objection submitting requester, it will review the reason, and subsequently it will decide implementation, then depending on its decision it will carry out the data processing related required termination and information providing related tasks.

Based on **Section 21 of the GDPR, data subject is entitled to object against the processing of personal data that refer to him or her done by Data Controller**, as follows:

- (1) The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on public interest, or in the interest of exercising a public authority authorisation, or in the justified interest of data processor (third party), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
- (2) Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
- (3) At the latest at the time of the first communication with the data subject, the right referred to the right to object shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
- (4) In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.
- (5) Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

## 12.9 The right of the data subject to complain and to legal remediation

In the case of unlawful data processing experienced by the data subject, data subject may initiate a civil lawsuit against Data Controller. Deciding the lawsuit belongs under the authority scope of the regional court. The lawsuit – according to the choice of the data subject – may be also initiated at the regional court of his or her place of residence.

Without prejudice to any other public administrative or court legal remedies, each data subject is entitled to submit a complaint to the supervisory authority – especially in the member state of its habitual residence, workplace or the place of assumed law violation – if according to the judgement of the data subject the processing of thee personal data referring to him or her violate the GDPR.

### ***National Authority for Data Protection and Freedom of Information (NAIH)***

- address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c
- postal address: 1530 Budapest, Pf.: 5
- e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)
- phone: +36 (1) 391-1400
- fax: +36 (1) 391-1410
- website: [www.naih.hu](http://www.naih.hu)

**Based on Sections (142) of the main text of the GDPR, the data subject is entitled to submit a complaint and to exercise court legal remedy, as follows:**

Every data subject should have the right to lodge a complaint with a single supervisory authority, in particular in the Member State of his or her habitual residence, and the right to an effective judicial remedy in accordance with Article 47 of the Charter if the data subject considers that his or her rights under this Regulation are infringed or where the supervisory authority does not act on a complaint, partially or wholly rejects or dismisses a complaint or does not act where such action is necessary to protect the rights of the data subject. The investigation following a complaint should be carried out, subject to judicial review, to the extent that is appropriate in the specific case. The supervisory authority should inform the data subject of the progress and the outcome of the complaint within a reasonable period. If the case requires further investigation or coordination with another supervisory authority, intermediate information should be given to the data subject. In order to facilitate the submission of complaints, each supervisory authority should take measures such as providing a complaint submission form which can also be completed electronically, without excluding other means of communication.



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| <b>13 Register of the data processed</b> |
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## 13.1 Data group „A” – Patient Monitor data (data of measurement services)

|                                    |  |
|------------------------------------|--|
| <b>Name of data group:</b>         | <b>Data group „A” – Patient Monitor data<br/>(data of measurement services)</b>  |
| <b>Purpose of data processing:</b> | Needed for defining the normal range of measured and calculated data based on pulse wave analysis, or for calculating the parameters |

| ID  | Name of field  | Reason of recording  | Legal basis of data processing | Source of the data            | Period of data retention       | Time of anonymisation                  | Time of data erasure                   | Data forwarding (Addressee)        | Data forwarding (purpose of communication)  |
|-----|--|--|--------------------------------|-------------------------------|--------------------------------|--|--|------------------------------------|---|
| A1  | Height of the person   | For calculating the parameters and for defining the normal range | Based on consent               | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None                                   | Attending doctor, Based on consent | Examination of the condition of the patient |
| A2  | Mass of the person   | For calculating the parameters and for defining the normal range | Based on consent               | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None                                   | Attending doctor, Based on consent | Examination of the condition of the patient |
| A3  | Date of birth  | For calculating the parameters and for defining the normal range | Based on consent               | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None                                   | Attending doctor, Based on consent | Examination of the condition of the patient |
| A4  | email address  | For identifying the patient                                      | Based on consent               | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | Time of account deactivation + 8 years | Attending doctor, Based on consent | Keeping contact with the patient            |
| A5  | Blood pressure (systolic/diastolic)                          | For the interpretation of the measured and evaluated data        | Based on consent               | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None                                   | Attending doctor, Based on consent | Examination of the condition of the patient |
| A6  | Condition at the time of measurement (after awakening, etc.) | For the interpretation of the measured and evaluated data        | Based on consent               | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None                                   | Attending doctor, Based on consent | Examination of the condition of the patient |
| A7  | Does s/he have any complaints?                               | For the interpretation of the measured and evaluated data        | Based on consent               | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None                                   | Attending doctor, Based on consent | Examination of the condition of the patient |
| A8  | Did s/he eat within the last 2 hours?                        | For the interpretation of the measured and evaluated data        | Based on consent               | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None                                   | Attending doctor, Based on consent | Examination of the condition of the patient |
| A9  | Did s/he consume alcohol within the past 2 hours?            | For the interpretation of the measured and evaluated data        | Based on consent               | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None                                   | Attending doctor, Based on consent | Examination of the condition of the patient |
| A10 | Did s/he consume any energy drinks within the past 2 hours?  | For the interpretation of the measured and evaluated data        | Based on consent               | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None                                   | Attending doctor, Based on consent | Examination of the condition of the patient |

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|     |   |   |                  |                               |                                |  |      |                                    |   |
|-----|---|---|------------------|-------------------------------|--------------------------------|--|------|------------------------------------|---|
| A11 | Did s/he consume any coffee in the past 2 hours?  | For the interpretation of the measured and evaluated data | Based on consent | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A12 | Did s/he implement any physical work/ sport activities within the past 2 hours?             | For the interpretation of the measured and evaluated data | Based on consent | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A13 | Other information that is important from the aspect of the circumstances of the measurement | For the interpretation of the measured and evaluated data | Based on consent | Data provided by data subject | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A14 | Pulse rate  | For the interpretation of the measured and evaluated data | Based on consent | Pulzoximeter                  | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A15 | Saturation (Haemoglobin oxygen saturation)  | For the interpretation of the measured and evaluated data | Based on consent | Pulzoximeter                  | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A16 | Pulse wave  | For the interpretation of the measured and evaluated data | Based on consent | Pulzoximeter                  | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A17 | Stiffness Index (Flexibility Index)   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve   | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A18 | Reflection Index  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve   | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A19 | Dicrotic Notch Index  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve   | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A20 | Systolic slope inclination alpha  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve   | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A21 | b/a   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve   | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A22 | d/a   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve   | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A23 | Ageing index  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve   | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A24 | c/d point detection rate  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve   | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A25 | Systolic/diastolic time ratio   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve   | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A26 | Left ventricular ejection time index (female)   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve   | Time of registration + 8 years | Time of account                        | None | Attending doctor,                  | Examination of the                          |

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|     |   |   |                  |                             |                                |  |      |                                    |   |
|-----|---|---|------------------|-----------------------------|--------------------------------|--|------|------------------------------------|---|
|     |   |   |                  |                             |                                | deactivation + 8 years                 |      | Based on consent                   | condition of the patient                    |
| A27 | Ejection time @60   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A28 | Crest time @60  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A29 | ELVET1 @60  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A30 | ELVET2 @60  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A31 | rMSSD (Parasympathetic nerve system activity index)                         | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A32 | Total Power (Autonomous nerve system activity indicating measurement index) | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A33 | LF Heart beat low frequency band performance                                | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A34 | HF Heart beat high frequency band performance                               | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A35 | LF/HF (Ratio of the low and high frequency band performances)               | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A36 | LF nu   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A37 | HF nu   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A38 | SDNN (spread of the NN intervals)   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A39 | Respiratory Rate  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A40 | PNN50   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A41 | HRV stress index  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| A42 | Mean Symp   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account                        | None | Attending doctor,                  | Examination of the                          |

|            |  |   |                  |                             |                                |  |      |                                    |   |
|------------|--|---|------------------|-----------------------------|--------------------------------|--|------|------------------------------------|---|
|            |  |   |                  |                             |                                | deactivation + 8 years                 |      | Based on consent                   | condition of the patient                    |
| <b>A43</b> | Mean p-symp  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| <b>A44</b> | MParaSD  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| <b>A45</b> | Poincare plot SD1  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| <b>A46</b> | Poincare plot SD2  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| <b>A47</b> | SD1/SD2  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| <b>A48</b> | DFA alpha1   | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| <b>A49</b> | MinHR (lowest pulse rate measured during the measurement)  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| <b>A50</b> | MaxHR (highest rate pulse measured during the measurement) | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
| <b>A51</b> | MSympSD  | For the interpretation of the measured and evaluated data | Based on consent | Calculated from pulse curve | Time of registration + 8 years | Time of account deactivation + 8 years | None | Attending doctor, Based on consent | Examination of the condition of the patient |
|            |  |   |                  |                             |                                |  |      |                                    |   |