

AS "SIROWA Dental Clinic"
PERSONAL DATA PROCESSING NOTIFICATION
FOR CLIENTS (PATIENTS) AND OTHER RELATED PERSONS

1. Information about the Controller

Our name is AS "SIROWA Dental Clinic", registration number: 40203053002, registered office: Katrīnas dambis 16, Rīga, LV-1045.

You can phone us at: [+371 67 098 260](tel:+37167098260) or e-mail to: klinika@sirowa.com.

2. Contact information for communication regarding personal data protection

If you have any questions regarding this notification or the processing of your personal data, you can get in touch with us using communication channels specified in the previous paragraph (Para. 1) or get in touch with our personal data protection specialist, by writing to the e-mail address: datuspecialists@sirowa.com.

3. General description of personal data processing performed by us

This notification describes how we process the personal data of our clients (patients), visitors of our website and of other persons, whose data might end up at our disposal within the framework of performing commercial activity.

We assume that, before using our website or becoming our client (patient), you have read this notification and have agreed to it. This is the current version of the notification. We reserve the rights to amend the notification and update it as needed.

The purpose of this notification is to give you a general insight into our personal data processing activities and purposes thereof, however, please bear in mind that also other documents (such as service agreements, regulations of cookie use) might contain additional information about your personal data processing.

We would like to inform you that the personal data processing provisions contained in this notification apply only to the protection of personal data of individuals.

Apart from these regulations, you can also read the following notifications of personal data processing:

- Regulations of the use of cookies (available at www.sirowaclinic.com)

We understand that personal data are important to you, and we will process them in line with confidentiality requirements and ensuring security of your personal data at our disposal.

4. Why do we process your personal data and what is the legal justification of processing personal data?

We will only process your personal data for defined legitimate purposes, including:

a) To start providing and to provide services, as well as to fulfil and enforce contractual obligations -

Within the framework of this objective, we will need to identify you, obtain your contact information, your health information, to ensure the calculation of relevant payments and to ensure the payment process, to get in touch with you with regard to matters relating to service provision and/or contract performance (incl., to issue invoices), and occasionally to ensure collection of outstanding payments.

For this purpose and previously described sub-purposes, we will need at least the following personal data: the client's (patient's) name, surname, identity number or date of birth, the name, surname and identity number of a minor patient's legal guardian; their telephone number, address, e-mail address; information about the patient's health condition and information that is necessary to provide medical treatment.

The main legal grounds to achieve these purposes are:

- consent of the data subject (item (a) of Article 6(1) and item (a) of Article 9(2) of the General Data Protection Regulation) for the purposes of receiving treatment services;
- entering into a contract with the data subject and its performance (item (b) of Article 6(1) of the General Data Protection Regulation);
- compliance with a legal obligation (item (c) of Article 6(1) of the General Data Protection Regulation)
- the controller's legitimate interest (item (f) of Article 6(1) of the General Data Protection Regulation), for instance, identification of you as a client (patient), identification of legal guardians of a minor patient, ensuring communication with you;
- processing is necessary for reasons of public interest in the area of public health (item (i) of Article 9(2) of the General Data Protection Regulation) - as regards the processing of special category data (health data).

b) Fulfilment of statutory requirements with regard to service provision or fulfilment of requirements of other laws

Within the framework of this purpose, we would need to observe the Medical Treatment Law, the Law on Patients Rights and the related Cabinet regulations with regard to the provision of medical services, forwarding/retention of patients' data in the health information system, procedure of medical record-keeping, procedure of issuing and storing prescriptions, as well as the Accounting Law, the Law on Archives and other regulatory enactments. Likewise, in cases and according to procedures established in regulatory enactments, we would have to provide certain information about you to other medical establishments for the purposes of medical treatment, to state institutions (such as the State Revenue Service, the State Labour Inspectorate, the Health Inspectorate, the State Agency of Medicines, supervisory authorities/institutions, courts, the prosecutor's office, the police, state inspectors for the protection of the rights of a child, the custody court, the State Probation Service, the Ombudsman, as well as a pre-trial investigation authority for the purposes of performing statutory functions) and law enforcement authorities.

For this purpose, we would need to process the following personal data: the name, surname, identity number, address of the client (patient), minor patient's legal guardians; the patient's health information.

The main legal grounds to achieve these purposes are:

- compliance with a legal obligation (item (c) of Article 6(1) of the General

5. Who can access your personal data?

We are taking relevant measures to process your personal data in line with applicable legal enactments and to ensure that your personal data are not accessed by any third parties, which have no legal justification to process your personal data.

Your personal data could be accessed, as needed:

- 1) to client (patient) data: by dentists, dentist's assistants and our employees or directly authorised persons, who need the access to fulfil their job duties (incl. access to special category data);
- 2) upon a written request and upon receiving a written authorisation from the head of our organisation – by another medical establishment for medical purposes, state institutions and law enforcement bodies (such as the State Labour Inspectorate, the Health Inspectorate, the State Agency of Medicines, supervisory authorities/institutions, courts, the prosecutor's office, the police, state inspectors for the protection of the rights of a child, the custody court, the State Probation Service, the Ombudsman, as well as a pre-trial investigation authority – to carry out functions prescribed in the law);
- 3) your relatives in cases specified in the Law on the Rights of Patients;
- 4) personal data processors pursuant to their rendered services and only to the extent necessary, such as, auditors, financial management and legal advisers, database developer/technical maintenance, other persons that are related to the provision of the controller's services;
- 5) third parties, upon duly considering whether such forwarding of data has adequate legal justification, for instance, providers of laboratory services, providers of orthodontics services, insurance companies, debt collectors, courts, out-of-court settlement establishments, bankruptcy or insolvency administrators, third parties, who maintain registries (such as the Population Register, Debtors' Register, among others);

6. What co-operation partners for personal data processing or personal data processors do we choose?

We take relevant measures to ensure your the processing, protection and forwarding of your personal data to processors pursuant to the applicable law. We carefully choose personal data processors and, in forwarding data, we review the necessity to do so and the extent of the forwarded data. Data are forwarded to processors in compliance with personal data confidentiality and secure processing requirements.

At this time, we can co-operate with the following categories of personal data processors:

- 1) outsourced accountants, auditors, financial management and legal advisers;
- 2) IT infrastructure, database owners/developers/technical maintenance specialists;
- 3) other persons related to ensuring the provision of our services;
- 4)

Personal data processors can changes from time to time, about which we will make relevant changes in this document.

7. Are your personal data sent to non-European Union (EU) or non-European Economic Area (non-EEA) countries?

We do not forward your data to countries outside the European Union or the European Economic Area.

8. How long will we retain your personal data?

Your personal data will be retained for as long as it they are necessary in line with the relevant purposes of personal data processing, as well as in compliance with the applicable law.

In considering the duration of personal data retention, we take into account the existing laws, aspects of fulfilling contractual obligations, your instructions (e.g., in case of consent), as well as our legitimate interests. If your personal data are no longer needed for the specific purposes, we will delete or destroy them.

Below are the most common durations of personal data retention:

- personal data that are necessary for the fulfilment of contractual obligations will be retained until the contract is fulfilled or until other retention periods expire (see below);
- pursuant to Cabinet Regulations No. 265 of 4 April 2006 “Procedure of record-keeping of medical documentation”, personal data contained in the Dental Patient’s out-patient card and the Log of Surgeries Records will be retained for 10 years;
- personal data that must be stored to fulfil legal requirements will be retained for a period established in the relevant regulatory enactment, *thus, for instance, the Law on Accounting prescribes that source documents must be stored until the day that they are necessary to establish the origins of each economic transaction and to follow its progress, however not less than 5 years;*
- We will be storing data to prove the fulfilment of our obligations for the general claim limitation period pursuant to the claim limitation terms established in regulatory enactments - 10 years in the Civil Law, 3 years in the Commercial Law and other terms, taking into account the terms for bringing action prescribed in the Civil Procedure Law.

9. What are your rights as a data subject with regard to the processing of your personal data?

Rights prescribed in the Law on the Rights of Patients

You are entitled to receive information prescribed in the Law on the Rights of Patients regarding the possibilities of receiving medical treatment services and the procedure of paying for them, the name, surname, position, profession, specialisation and qualification of the treating physicians and other medical personnel involved in the health care process; information about your health condition, the treatment plan and medical treatment services provided to you, as well as other information established in the Law on the Rights of Patients.

You are entitled to examine your medical documentation, request and receive excerpts, true copies and copies in line with the price list approved by the medical establishment, except as prescribed in the regulation protecting the data of natural persons. You are also entitled to receive information about the use of your information included in medical documentation pursuant to the provisions of the Law on the Rights of Patients and the regulations of protection of data of natural persons. We undertake to issue excerpts, true copies and copies to you within 3 (three) working days from the date of lodging a relevant request; you will be able to receive information that is to be issued to you pursuant to the regulations of protection of data of natural persons within periods described further on in this clause.

Updating personal data

If changes have occurred in personal data that you have submitted to us, such as changes in the identity number, correspondence address, telephone number or e-mail address, please get in touch with us and submit the updated data to us so that we can fulfil the relevant purposes of data processing.

Your rights to access and rectify your personal data

Pursuant to the General Data Protection Regulation, you are entitled to access your personal data that are at our disposal, request that they are rectified, erased, to request processing is restricted, to object to the processing of your data, as well as rights to data portability in cases and in compliance with procedures established in the General Data Protection Regulation.

The enterprise respects these rights that you have to access your personal data and control them, therefore, in case we receive a request, we will get back to you within periods established in regulatory enactments (usually, *no later than within one month*, unless the request is of a special nature that requires a longer time to prepare the reply), and, if it is possible, we will accordingly rectify or erase your personal data.

You can obtain information about your personal data held by us or to exercise any of your other rights as a data subject in any of the following ways:

- 1) by submitting a relevant application in person and by identifying yourself at the premises of our clinic, at: Katrīnas dambis 16, Rīga, LV-1045, every weekday between 10-16;
- 2) by submitting a relevant application, sent to us via mail at: Katrīnas dambis 16, Rīga, LV-1045.
- 3) by submitting a relevant application, sent to our e-mail: klinika@sirowa.com; it is recommended to sign it with a secure electronic signature.

Upon receiving your application, we will consider its contents and the possibility of your identification, and depending on the specific situation, we reserve the right to ask that you additionally identify yourself, in order to preserve the security of your data and ensure disclosure to the relevant person.

Withdrawal of consent

10. Where can you lodge a complaint regarding issues related to personal data processing?

If you have any questions or objections regarding the personal data processing that we perform, we urge you to first get in touch with us as instructed in Para. 2 of the present notification.

If, however, you still believe that we have failed to mutually resolve the occurring problem and you think that we continue infringing your rights to personal data protection, you are entitled to submit a complaint at the Data State Inspectorate. You can find sample applications to be submitted to the Data State Inspectorate and other related information on the website of the Data State Inspectorate (<http://www.dvi.gov.lv/lv/datu-aizsardziba/privatpersonam/iesniegumu->).

11. Why do we have to give our personal data?

Mainly, we collect your information for the purposes of providing medical treatment, in order to fulfil contractual obligations, fulfil binding legal obligations and to exercise our legitimate interests. In these cases, the collection of certain information is necessary for us to achieve specific objectives; therefore, failure to provide such information can undermine the possibility of providing the service, the commencement of business relations or the fulfilment of a contract. If data are not mandatory, but providing such data might help to improve the service or to offer you more favourable contractual conditions and/or offers, at the time of data collection, we will state that the provision of data is voluntary.

We would also like to inform you about the main legal requirements as regards personal data processing:

- 1) the Law on Medical Treatment, the Law on the Rights of Patients and the adopted Cabinet regulations related thereto prescribe that you have the obligation to actively participate in the treatment and must provide us with the following information:
 - your personal identification data and contact information;
 - information necessary to ensure treatment;
 - information about your medical conditions that might endanger the life or health of other individuals;
 - prior consents or refusals regarding treatment;
 - changes in the health condition occurring during the treatment.
- 2) The Law on Accounting prescribes the provision of the following personal data in the document of economic transaction (the contract), if a party thereto is a natural person: name, surname, identity number (if assigned), the person's stated address, or, in absence thereof, the declared domicile.

12. How we obtain your personal data?

We can obtain your personal data in one of the following ways:

- 1) from you, when you address us for the purposes of receiving medical treatment services;
- 2) in a process of entering into a contract, obtaining data from you personally;
- 3) if a contract is entered into with a third party and they have indicated you as the contact person;
- 4) from you if you lodge any submissions, e-mails, make calls to us;
- 5) from you if you subscribe to our online services;
- 6) on the website www.sirowaclinic.com. by using cookies;
- 7) occasionally, from third party databases, such as, when assessing your solvency, we can obtain data from third parties for this purpose; or, obtaining information about you from the unified electronic information system of the state health sector (e-Health);
- 8) as might be the case, from video surveillance recordings.

13. Are your personal data used to make automated decisions?

We are not using your data to make automated decisions.