

INFORMATION NOTICE CONCERNING THE PROCESSING OF PERSONAL DATA

by CENTRUL MEDICAL UNIREA SRL
and the companies controlled by it



REGINA MARIA
REȚEAUA PRIVATĂ DE SĂNĂTATE

To make it easier for you to go through this Information Note, below are the sections you can consult:

1. About this Information Notice
2. Who are we
3. Categories of personal data we process
4. Source from which we receive your personal data
5. The bases on which we process your personal data
6. Purposes for which we process your personal data
7. Recipients of your data
8. International data transfers
9. How long we retain your data
10. Security of your data
11. Your rights and how can you exercise them
12. What can happen if you do not provide us with your data
13. Automatic decision-making process
14. Applicability of this Information Notice
15. Changes to this Information Notice
16. Meaning of the terms used in this Notice

1. ABOUT THIS INFORMATION NOTICE

Centrul Medical Unirea SRL is the company that has direct control over all the companies that together operate under the trade name Regina Maria Healthcare Network, collectively referred to as Regina Maria.

The companies within the group, as found [here](#), acting as joint data controllers, appoint Centrul Medical Unirea SRL (CMU), as the main controller, to represent them in the relationship with the data subjects and with the National Authority for the Supervision of the Processing of Personal Data (“ANSPDCP”), including for the purposes of this Information Notice.

You can find below information about our identity and contact details. Below you can also find the contact details of Regina Maria’s Data Protection Officer .

At Regina Maria we take very seriously the respect for your data. The compliance with the legislation concerning personal data protection and best practices in the field, as well as ensuring a climate of transparency, security and trust for our patients is a priority for us, for which our employees, collaborators, partners and management firmly state their support.

The purpose of this Notice is to provide general information regarding the processing of our patients' data when accessing our medical services. For some categories of services that involve specific data processing, we provide you with special notices detailing how we process the data in that case.

This Notice contains important information. We encourage you to take the time to read it thoroughly and carefully and make sure you fully understand it. In order to facilitate the reading of the document, we included at the end of the Notice a glossary explaining the main terms used herein (e.g., "personal data", "processing", etc.). Do not hesitate to contact us with any questions you might have. We want to make it clear to you how we use your data and how we protect it.

The content of this Information Notice is purely informative and does not affect the rights you enjoy under the data protection legislation. We will do our best to facilitate you their exercise.

Thank you for your trust in our services and in the way we work with your data.

2. WHO WE ARE

The Regina Maria Healthcare Network is the private medical service operator in Romania that brings together more than 8,000 employees and collaborators in its 53 own locations in Bucharest and in the country, through which it serves more than 5 million patients.

In numbers, Regina Maria Healthcare Network means: 53 own locations, 8 hospitals, 13 daytime hospitalization centers, 4 maternity hospitals, 11 medical campuses, 27 imaging centers, 37 laboratories, own stem cell bank and over 340 partner polyclinics throughout the country. Furthermore, Regina Maria introduced in Romania the concept of medical subscriptions for companies, over 25 years ago, and launched the first range of medical packages for SMEs and startups, regardless of the number of employees.

If you have any comments, suggestions, questions or concerns about any information in this Notice or about any other matter related to our processing of your data, please do not hesitate to contact our Data Protection Officer at any time. Depending on your preferences, you can contact us through any of the communication channels below.

Our entire team will make all reasonable efforts to ensure that we give you an answer as quickly and thoroughly as possible.

Our contact data

Full name: Centrul Medical Unirea SRL together with all the legal entities identified [here](#)

Headquarters address: 5B Ion Ionescu de la Brad Boulevard, District 1, Bucharest

Administrative Headquarters (mailing address): Globalworth Tower, 17th floor, 201 Barbu Vacarescu Street., District 2, Bucharest

Telephone number: 021 9268 or *9268 or 021 9886 (available 7.30 - 21.00 Monday – Friday and 8.00 - 20.00 at the weekend)

Online: The Support Section in the mobile application or <https://www.reginamaria.ro/suport>.

E-mail: office@reginamaria.ro.

Contact details of our Data Protection Officer (this is the person you need to contact for any issues related to the protection of your personal data)

Mailing address: Globalworth Tower, 17th floor, 201 Barbu Vacarescu Street., District 2, Bucharest

E-mail: dpo@reginamaria.ro

3. CATEGORIES OF PERSONAL DATA WE PROCESS

The personal data relating to you that we process are mainly the data obtained directly from you or resulting from the provision of services by one of the companies within Regina Maria and include the following categories:

Identification data, namely: last name; first name; gender; date of birth / age; the fact that you are a Romanian citizen or resident or a foreign citizen, personal identification number (CNP) – if applicable. These are required for the creation of your patient file and the your correct identification when accessing the requested medical services.

Contact details, namely: mailing/invoicing address, telephone number, email address. We will use these for communication related to medical appointments, invoices or, if we have your permission to do so, commercial communications regarding our services.

Data related to contracts, such as: date of beginning and termination of a contract, type of contract, inclusions, contract value, invoicing details.

Data related to balances and payments, such as: information regarding payments and outstanding balances; the number of the bank account or bank card used for payments; last name and first name of the holder of the bank account or bank card (it can also be someone other than you if they paid an invoice on your behalf); information about the bank card validity.

Details related to subscriptions and insurances, namely: whether you have a subscription, type thereof, inclusions, validity period of such subscription, employer through which you benefit from the subscription – if applicable; quality of insurant/non-insurant, insurer, type of insurance, inclusions, validity period of such insurance – in case of private insurances.

Professional information, namely: employer, date of employment, information regarding the place where you perform your work, your position, the risks to which you are exposed through the work you perform. We process these categories of data only in the case of patients for whom we perform occupational medicine checkups.

Other personal data related to you, namely: video recordings (in our locations where we have video surveillance cameras installed - where they exist, they are indicated by visible signs); records of calls made in the Contact Center; in certain cases, such as the online validation of *My Account*, we also process the information in your identity document (including the date of issuance, issuer, date of expiry of the document, place of birth).

Data concerning purchases and interactions with us, such as: records of your interactions with us; details of your purchase history from us.

Location data, such as: place or area where you are or where you were in a certain period of time – only if you use our mobile application and you have enabled location options.

Opinions and views (may include special categories of data), such as: any opinions or views that you submit to us or any opinions and views that you publicly post about us on our social media pages.

Data concerning health (special category of personal data), such as: symptoms; previous diseases; your medical history, including results of previous blood tests and investigations, previous interventions, medication administered; hereditary-collateral history; blood group; medical services you access with Regina Maria; results of blood tests and investigations we perform on you; diagnoses; hospitalizations, interventions and medical maneuvers we perform; treatment we prescribe or administer to you; the physician you consulted; medical recommendations; data from your hospital medical file.

Genetic data (special category of personal data), if you undergo genetic testing.

Biometric data (special category of personal data): if you choose the remote validation of My Account, we process biometric data that allows the photo from the Identity Card to be compared with the image captured by you in order to verify your identity. This data is processed exclusively based on your consent, it is protected by special security measures and is stored for a limited period of time.

As shown in the list above, you might have to give us information about other people - for example, the medical history of relatives who are suffering from the same medical condition. When these

refer to identified or identifiable persons, we will treat this information as personal data of those persons and we will also provide them with the necessary protection. However, we will strictly comply with our obligation of professional secrecy (including medical secrecy) towards you, and will not inform those persons about such processing.

4. SOURCE FROM WHICH WE RECEIVE YOUR DATA

We collect most of the data directly from you, when you sign a medical services contract, when you are admitted to one of our hospitals, or when you access medical services in one of our clinics / laboratories. This data includes identification, contact, invoicing and payment data, as well as medical data, provided by you and necessary for the provision of the requested services. We constantly try to keep your data as accurate and up-to-date as possible. For this, we continuously run campaigns to update your data.

Additionally, we may collect data about you from the following sources:

For the occupational medicine services, prior to your employment or at any time during the course of the contract, your employer will disclose us the following data about you, that will allow us to identify you and determine the types of checkups and investigations required by applicable legislation: last name; first name; personal identification number (CNP); employer's identity; professional details.

For the beneficiaries of medical subscriptions contracted by your employer or by the employer of a member of your family, we may receive from our client or directly from the family member: your last name, first name, personal identification number (CNP), type of subscription selected.

For the beneficiaries of medical insurances, depending on the contract between us and your insurer, they will disclose us: your last name, first name, personal identification number (CNP), contact data (telephone and / or e-mail).

If you access **services covered one of the National Insurance Houses ("NHIH")**, we will receive from the respective NHIH and from the referring physician information regarding your last name, first name, CNP and diagnosis, as well as the recommended investigation; additionally, for reporting the service in the information system of the NHIH, we confirm your quality as insurant, by querying the database of the NHIH.

If you benefit from **paraclinical services provided based on a contract concluded between us and another public or private medical provider**, we receive from it: your last name, first name, CNP, name of requested services, referring physician, biological samples collected and sent for processing.

If you access **services from one of our partner clinics**, we receive from them: date of your visit, name and location of the clinic, medical specialty, name of the physician, name of the service and data concerning your health related to the said medical services.

We may also receive **your data as a result of the integration with our Healthcare network of a medical facility** of which you are a patient. In these cases, we will ensure that the purposes of processing your data will remain unchanged – the provision of medical services and the observance of associated legal obligations, as well as the fulfillment of legitimate interests. In case of commercial communications, we will request your specific prior consent, as in the case of any new patient. In all cases, we will inform you about the collection of your data as a result of an M&A transaction within the legal period of one month.

5. BASES ON WHICH WE PROCESS YOUR DATA

We process your personal data, other than special category data, in order to be able to **conclude and perform a medical services contract with you**, at your request, including to communicate

to you (i) information about the purchased subscription and steps to activate it, (ii) appointment confirmations, (iii) details on preparatory measures for some investigations, as well as (iv) information regarding invoices, balances and payments.

We also process your data to fulfill **our legal obligations, for example** those referring to archiving and the reporting of certain information to public authorities, especially in the field of public health and fiscal authorities.

There are cases where we process your data based on **our legitimate interest**, for instance in order to update your identification and contact details, improve our services, ensure the order and security of goods and persons in our clinics and hospitals or to resolve disputes and formulate defenses.

As for **our commercial communications**, we process your data only based on your consent to the processing for this specific purpose, within the limits of the consent thus granted.

The bases on which we process special categories of your personal data

In order to provide medical services – our object of activity – we also process a series of data concerning health, when the processing is necessary for the assessment of your working capacity (checkups upon employment or periodical checkups), establishing a medical diagnosis, provision of health or social care systems and services.

We may also process your data in **medical emergencies** or other situations where you are unable (physically or legally) to consent to the processing, in which case we may process special categories of your data in order to protect your or another natural person's vital interests.

In special cases, we may need to process your data concerning health for **reasons of public interest** in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law.

In the event of disputes that we cannot solve amicably, it is possible that we process your special data (for example, results of tests based on which a particular diagnosis has been decided) for **finding, exercising or defending our right in front of a legal court.**

6. PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA

Provision of medical services for you and their reporting. Provision of medical services; registration of provided medical services; activation or customisation of your subscriptions; appointments; your identification and the identification of the services provided; delivery of results for provided services or - in case of occupational medicine checkups - provision of legal documents to your employer, implementation of or changes to operational procedures or systems that have an impact on the way the medical activity is performed.

Managing our communication and IT (information technology) systems. Managing our communication systems; managing our IT security; performing security audits on our IT networks, issuing reports to authorized institutions in the field of information security, or repairing system failures.

Fulfilling our legal obligations. Fulfilling our legal obligations with regard to archiving, healthcare, security, record keeping and other obligations that law imposes on us.

Financial management. Issuing receipts, tax receipts, invoices to you; receiving payments from you including registering payments made by others on your behalf; debt recovering (including

through debt recovery companies - details below in the section concerning recipients of your data); refunding money to you; transmission of notifications; referral to courts; preparation of financial / operational reports, activity reports and preparation of financial statements / statements concerning contracts.

Commercial communications. Communicating to you by any means (email, telephone, short text messages (SMS), messages on social media platforms) news about the medical services available within Regina Maria, or providing other information that may interest you.

Settlement of disputes. Resolving your complaints and requests; preparing requests and defenses before public authorities and other entities that settle disputes. Removal of the suspicion of malpractice.

Improving services and processes. Identifying potential issues with our existing services in order to improve them (including by conducting audits); testing the improvements made to our services or our new services.

Surveillance of Regina Maria premises according to applicable legal provisions and to ensure the order and security of goods and persons, with the help of CCTV systems on our premises.

M&A transactions. It is possible in the future for Regina Maria to decide to disclose your data in the context of M&A transactions.

7. RECIPIENTS OF YOUR DATA

As a rule, we do not disclose your data to other companies, organizations or persons in any country (including Romania).

In certain circumstances, however, we might disclose your data to other natural or legal persons. Below you can find the main categories of such recipients:

Your employer – in connection with the assessment of your working capacity for purposes related to occupational medicine, within the limits set by applicable legislation, excluding information on results of the performed checkups and medical investigations.

Other companies within Regina Maria group – for legitimate reasons related to our activity (including the medical services we provide and the operation of our website), in accordance with the applicable legislation.

Public authorities in any field (in particular public healthcare authorities in Romania: National Health Insurance House, Ministry of Health, National Institute of Public Health, Ministry of Finance and others) – at their request or at our initiative, in accordance with applicable legislation.

Insurers in Romania or other states – at your express request, in connection with the services you received in our clinics.

Accountants, auditors, lawyers and other professional consultants in Romania or abroad – they will be bound by a law and/or by the contract concluded with us to maintain the confidentiality of your data.

Natural or legal persons acting as data processors for Regina Maria, in various fields (for example, providers of debt collection services, archiving or document destruction services, payment services, marketing and advertising services, etc.), that we will oblige to comply with the requirements of the legislation that protects your rights.

Any relevant person, agency or court in Romania or other state – to the extent necessary to establish, exercise or defend our rights in court.

Any purchasers or possible relevant purchasers in the medical sector or other sectors, in Romania or another state – if we sell or transfer all or part of our shares, our assets or business (including in case of our reorganisation, dissolution or liquidation) - they will be subject to a confidentiality obligation.

Collaborating physicians and other medical services providers; each of them is obliged by law or by the contract concluded with us to maintain the confidentiality of your data.

When we use a natural or legal person as processors to process your personal data, we will make sure that it has concluded a written agreement with us through which it undertakes, among other obligations that the personal data protection legislation provides, the obligations to (i) process personal data only in accordance with our written instructions, and to (ii) effectively implement measures to protect privacy and ensure the security of personal data. We will also ensure that the written document between us and the processor provides for it at least all the other obligations imposed by the applicable legislation concerning the protection of personal data.

8. TO WHOM AND IN WHAT CONDITIONS WILL WE TRANSFER YOUR DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANIZATION

As a principle, we aim not to transfer and do not intend to transfer your personal data or part of it to other companies, organizations or persons from third countries or to international organisations.

In certain limited situations, transfers to third countries without adequacy decisions may only be made based on appropriate safeguards, or, in special circumstances, made based on consent, for the implementation of a contract at your request (for example, in order to perform specialized blood tests, at the express request of our patients, we transmit personal data to medical centers outside Romania, including the USA).

If it is necessary to transfer your data to any of the above-mentioned destinations, we will inform you in advance both about the destination of the transfer and about the legal basis for such transfer and, where necessary, we will obtain your consent in this sense.

9. HOW LONG WE RETAIN YOUR DATA

We will store your data for different periods of time, depending on the category of data, the purposes and legal bases for which we process them. Below are details on the retention periods for the main categories of data we process:

The most important category of personal data that we process is **information about your health status**, recorded when you access our medical services. These data also have the longest retention period – between 30 years in the case of written documents without technical value, and 100 years in the case of medical documents.

Identification data are accessories to the data regarding the patient's health status and they are therefore retained throughout the period of storage of the medical data, for the correct identification of the patient to whom they refer.

Contact details of our patients are updated according to this Information Notice or at any time of your choice. Depending on the situation, we will need to process your contact data for the entire validity period of a contract or subscription, as long as you have a general practitioner (“medic de familie”) with us, when you are on our records with certain chronic or communicable diseases or if you are registered with outstanding debits.

Financial data: if you make payments for individual contracts or for services, we process details related to them, which we keep, according to financial accounting regulations, for a period of 5 to 10 years.

Information regarding your contract – we will retain it for the entire contract period and for a period of 3 years thereafter.

Call recordings in the Contact Center are kept for a period of up to 3 years, the general statutes of limitations.

Images captured by the surveillance cameras in our clinics are stored for up to 30 days.

10. SECURITY OF YOUR DATA

We work hard to protect our clients, other persons whose data we process and ourselves against unauthorized access, and unauthorized modification, disclosure, or destruction of the data we process. In particular, we have implemented the following technical and organizational measures to ensure the security and privacy of personal data:

Dedicated policies. We adopt and review our data processing practices and policies for our clients and other persons, including physical and electronic security measures, to protect our systems against unauthorized access and other possible security threats. We constantly check how we apply our own data protection policies and how we comply with data protection legislation.

Data minimization. We have ensured that your personal data that we process are limited to those that are necessary, adequate and relevant to the purposes stated in this note.

Limited access to data. We strictly limit the access to the personal data that we process to the personnel, collaborators, and other persons who need to access them to carry out their activity. All these companies and natural persons are subject to strict privacy obligations and we will not hesitate to hold them accountable and stop working with them if they do not treat the protection of data with the utmost seriousness.

Specific technical measures. We have purchased and use technologies to ensure our clients and other persons that their data security is protected, both during storage and in transit, using modern encryption methods. In order to protect your data security, we recommend that you do not use multiple access equipment, and you do not disclose to other persons your login data to the App.

Back-ups and security audits. We work hard to protect our systems from accidental or unauthorized access or alteration and from other possible threats to their security. For this reason, once you delete information from your account, we may not immediately delete the copies or backups that we have created. We make daily archives (back-ups), which we keep secure for at least six (6) months. All the technical equipment that we use to process your data is secured and updated to protect the data. We also perform, on a regular basis, security audits with independent auditors from the Big Four on the computer systems that we use to process the personal data of our clients and of other persons.

Ensuring the accuracy of your data. It is possible that from time to time we ask you to confirm the accuracy and/or actuality of your personal data that we are processing.

Training of the personnel. We constantly train our personnel and contractual staff on the legislation and best practices in the field of personal data processing.

Data anonymisation. Where possible and appropriate to our work, we anonymize/pseudonymize the personal data that we process, as an additional protective measure.

Control of our service providers. We insert into the contracts concluded with those who process for us (processors) or together with us (joint controllers) clauses or annexes to ensure the protection of the data we process, and make best efforts to verify the implementation thereof by our providers.

Although we take all the reasonable measures to ensure the security of your data, we cannot guarantee the absence of any security breach or failure to penetrate the security systems. In the unfortunate and unlikely event that such a breach occurs, we will follow the legal procedures to limit the effects and to transparently inform the data subjects.

11. YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM

We treat your rights in relation to the processing that we make on your data with utmost care. We will continue to take all reasonable measures to ensure that they are respected.

YOUR RIGHTS

The right of access to data. You have the right to obtain the access to your data that we process or to copies thereof; you also have the right to obtain from us information about the way in which we process this data, including the purposes and duration of processing, the recipients or categories of recipients to whom we disclose your data, the source of your data that we have not collected directly from you.

The right to data rectification. You have the right to obtain the rectification of inaccuracies or the supplementation of your data that we process.

The right to data erasure ("the right to be forgotten"). You have the right to obtain from us the erasure of your data, if we no longer have a basis for processing them, for example if we have no legal obligation or legitimate interest to keep them. Our responses to erasure requests are always accompanied by explanations regarding the limits of the possibility to exercise this right, depending on the categories of data we process in connection to you.

The right to restriction of processing. You have the right to restrict the processing of your data, for the period indicated by you.

The right to data portability. You have the right to receive directly or to obtain the transfer to another controller of data that you have provided directly and that are processed by automated means.

The right to object. You have the right to object to the processing of data that we process in connection to you based on our legitimate interest.

The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you without your consent in this regard.

Right to withdraw your consent. In situations where we process your data based on your consent, you have the right to withdraw your consent at any time, at least as easy as it was to give it; such withdrawal will not affect the lawfulness of the processing of your data that we performed before withdrawing.

Right to submit a complaint to the supervisory authority. You have the right to submit a complaint to the personal data processing supervisory authority about the processing of your data by us.

HOW CAN YOU EXERCISE YOUR RIGHTS

In order to exercise or to find out more details about any of these rights you can send a request through the contact form available at <https://www.reginamaria.ro/suport> or in the Support section in Regina Maria mobile application. You can also write to us at dpo@reginamaria.ro.

You can manage your consents for commercial communications in the Consent section in My Account, and those for the use of cookies in the Cookie Consent/Tracking Consent section on the website, and the mobile application, respectively.

We will try to answer as quickly and completely as possible to all your questions and concerns and to facilitate the exercise of your rights.

12. WHAT CAN HAPPEN IF YOU DON'T PROVIDE US WITH YOUR DATA

You do not have an obligation to provide us your personal data mentioned in this document.

However, if you do not provide us these data, it will not be possible for us to provide you the services you request.

In general, if you do not want to provide us data about you, you may not be able to access our medical services.

13. AUTOMATIC DECISION-MAKING PROCESS

As a rule, as a user of our services, you will not be subject to a decision based solely on the automatic processing of your data (including profiling) that produces legal effects in respect of you or that affects you in a similar way to a significant extent.

Depending on your consents given for commercial communications and the use of cookies, we may send you messages about our services customized according to your interests.

14. APPLICABILITY OF THIS INFORMATION NOTICE

This Information Notice applies to the services that we provide to you and to the products that you purchase from us (including occupational medicine or medical subscriptions provided by your employer).

This Notice does not apply to the services or products provided by other companies or natural persons that are not part of the Regina Maria Healthcare Network, including the ones provided by our partner clinics, posted on our websites or about which we inform you in another way.

15. CHANGES TO THIS INFORMATION NOTICE

We may change this Notice from time to time. In such cases, we will inform you, and we will not reduce your rights to your data through such changes we might make.

We will post this Information Notice on our website, at the following address: <https://www.reginamaria.ro/gdpr>. We will also keep all the previous versions thereof in an archive on our website, so that you can consult them at any time.

16. THE MEANING OF TERMS USED IN THIS NOTICE

Supervisory authority for the processing of personal data: an independent public authority which, according to the law, has duties related to the supervision of the compliance with the legislation concerning personal data protection. In Romania, this supervisory authority for the processing of personal data is the National Authority for Personal Data Processing Supervision (ANSPDCP).

Personal data: any information relating to an identified or identifiable natural person (the "data subject"). A natural person is identifiable if it can be identified, directly or indirectly, in particular by reference to an identification element, for example: name, identification number, location data, online identifier, one or more elements specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that person. So, for example, the notion of personal data includes the following: first name and last name; home or residence address; e-mail address; telephone number; personal identification number (CNP); geolocation data. The categories of personal data about you that we process are listed above.

Special categories of personal data: personal data that: reveal the racial or ethnic origin, political opinions, religious confession or philosophical beliefs, or membership of trade unions; genetic data; biometric data to uniquely identify a natural person; data concerning the health status, sexual life or sexual orientation of a natural person.

Controller: natural or legal person who decides why (for what purpose) and how (by what means) personal data are processed. According to the law, the responsibility for complying with the legislation concerning personal data rests primarily with the Controller. In the relationship with you, we are the Controller and you are the data subject.

Processor: any natural or legal person who processes personal data on behalf of the Controller, other than the Controller's employees.

Data subject: natural person to whom certain personal data refer (to whom they belong). In the relationship with us (the Controller), you are the data subject.

Processing of personal data: any operation/set of operations performed on personal data or on sets of personal data, with or without the use of automated means; for example: collecting, recording, organizing, structuring, storing, adapting or modifying, extracting, consulting, using, disclosing by transmitting, disseminating or making available in any other way, aligning or combining, restricting, deleting or destructing such personal data/sets of personal data. These are just examples. Practically, processing means any operation on personal data, whether by automatic or manual means.

Third state: a state outside the European Union and the European Economic Area.



REGINA MARIA
REȚEAUA PRIVATĂ DE SĂNĂTATE

www.reginamaria.ro
Call Center: 021 9268