

**DATA MANAGEMENT INFORMATION
THE RIGHTS OF THE NATURAL PERSON CONCERNED
WITH REGARD TO THE PROCESSING OF HIS OR HER
PERSONAL DATA**

INTRODUCTION

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 (hereinafter referred to as the Regulation, GDPR) requires that the controller takes appropriate measures to provide the data subject with all information relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form, in a clear and plain language, and that the controller facilitates the exercise of the data subject's rights.

The obligation to inform the data subject in advance is also provided for in Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information. The following information is provided to comply with this legal obligation.

Why this leaflet?

The Data Controller processes personal data for a number of purposes in the course of its operations and aims to do so in a way that respects the rights of data subjects and complies with legal obligations. The Data Controller also considers it important to describe to data subjects the processing of personal data that it has become aware of in the course of its processing activities and its main features.

On what basis is the personal data of data subjects processed?

Personal data will only be processed for specific purposes and on an appropriate legal basis. These purposes and legal bases are described individually for each specific processing operation.

What external assistance is used to process your personal data?

Personal data are mostly processed by the Data Controller at its own premises. However, there are operations for which it uses external assistance, a data processor. The identity of the processor may vary according to the characteristics of each processing operation.

Who processes your personal data?

The Data Subject may obtain information on the identity and contact details of the data processors employed by the Data Controller in the following Chapter II of the Data Protection Notice.

What principles does the Data Controller consider important when processing your personal data?

Personal data is processed in accordance with the applicable legislation, in particular Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR Regulation).

In the course of its activities, the Data Controller will only process personal data within the scope of the specific processing and the security of the personal data provided will be protected by technical and organisational measures that are possible and necessary. In doing so, particular attention will be paid to ensure the confidentiality, integrity and availability of personal data.

The Data Controller is responsible for the truthfulness and accuracy of the personal data once they have been provided by the Data Subject. The terms used in this notice shall have the meaning given to them in the interpretative provisions of the Regulation on the right of information self-determination and the GDPR.

**I. CHAPTER 2
NAME OF THE CONTROLLER**

The publisher of this information is also the Data Controller:

NAME: **MEROVA Health Zártkörűen Működő Részvénytársaság**

HEAD OFFICE: 1095 BUDAPEST, DANDÁR UTCA 9-11. B. LHÁZ. FSZ. 5. DOOR

COMPANY REGISTRATION NUMBER: 01-10-142395
ADDRESS: 32306044-2-43
DESCRIPTION: Kornélia Menyhárt Chairman of
the Board E-MAIL: lia@merovahealth.com
AVAILABILITY: <https://merovahealth.com> under "contact"
(hereinafter referred to as "the Company")

The Data Controller has a Data Protection Officer, who continuously monitors and controls the lawfulness of data processing, and also serves as a point of contact for Data Subjects and the supervisory authority, the National Authority for Data Protection and Freedom of Information, through its operational staff.

Name of the Data Protection Officer appointed by the Data Controller: **Dr. Ferenc József Tanács, lawyer**
ADDRESS: 6726 SZEGED, BÉRKERT UTCA 64/B., www.drthanacs.hu
E-MAIL: dpo@drthanacs.hu

If you have any questions about the processing carried out by the Data Controller or if you wish to exercise your rights under this Privacy Notice, please contact the Data Protection Officer at one of the contact details above, who will be happy to assist you.

II. CHAPTER 3 NAME OF PROCESSORS

Data processor: a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller; (Article 4(8) of the Regulation)

The use of a processor does not require the prior consent of the data subject, but the data subject must be informed. Accordingly, the following information is provided:

Storage space provider:

COMPANY: DigitalOcean, LLC.
LOCATION: 101 Avenue of the Americas, 10th Floor, New York, NY 10013
HONLAP: <https://www.digitalocean.com/>
The Data Controller stores personal data exclusively on European servers.

Data processor providing development services:

COMPANY: FIREGIZE Ltd.
LOCATION: 7678 Abaliget, Kossuth Lajos utca 16.
ADDRESS: 27558599-2-02
COMPANY REGISTRATION NUMBER: 02-09-086431

Data processors providing IT services:

COMPANY: HubSpot, Inc.
LOCATION: 25 First Street, 2nd Floor Cambridge, MA 02141
HONLAP: <https://legal.hubspot.com/>

COMPANY: Slack Technologies Limited
LOCATION: Salesforce Tower 60 R801, North Dock Dublin Ireland
HONLAP: <https://slack.com/>

Data processor for accounting and payroll tasks:

COMPANY: SZEMIRÁMISZ Ltd.
LOCATION: 2030 Érd, Csúcs utca 7.
ADDRESS: 11365822-1-13
COMPANY REGISTRATION NUMBER: 13-09-190187

Newsletter provider:

COMPANY: Twilio Ireland Limited
LOCATION: 3 Dublin Landings, North Wall Quay, Dublin 1, Ireland
HONLAP: <https://www.twilio.com/>

Data processor providing billing services:

COMPANY NAME: Billingo Technologies Zártkörűen Működő
Részvénytársaság LOCATION: 1133 Budapest, Árbóc utca 6.
ADDRESS: 27926309-2-41
COMPANY REGISTRATION NUMBER: 01-10-140802
HONLAP: www.bilingo.hu

Online payment service provider:

COMPANY: Stripe Payments Europe, Limited (SPEL)
LOCATION: 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, D02 H210, Ireland
HONLAP: <https://stripe.com/en-hu>

Data processor for the organisation of training courses and the verification of qualifications:

COMPANY: Excellence Hungary Kft.
LOCATION: 4029 Debrecen, Cegléd utca 11.
ADDRESS: 27982828-2-09
COMPANY REGISTRATION NUMBER: 09-09-031804

Other Recipients:

COMPANY: Google Ireland Limited
Company incorporated in Ireland and operating under the laws of Ireland REGISTRATION
NUMBER: 368047
TAX NUMBER: IE6388047V
LOCATION: Gordon House, Barrow Street, Dublin 4, Ireland
HONLAP: <https://www.google.co.uk/>

COMPANY: Meta Platforms Ireland Limited
LOCATION: 4 Grand Canal Square, Grand Canal Harbour Dublin 2, Ireland
LOCATION: <https://www.facebook.com/>

COMPANY NAME: LinkedIn Ireland Unlimited
Company LOCATION: Wilton Place, Dublin 2,
Ireland HOME: <https://www.linkedin.com/>

COMPANY: Microsoft Ireland Operations Ltd.
LOCATION: One Microsoft Way Redmond, Washington, USA
HONLAP: <https://www.microsoft.com/>

In cases where the Prospectus generally refers to transfers to the Company's data processors, it should be understood to refer to transfers to the above recipients.

Hand and foot care:

By accepting this information, the client acknowledges that his/her personal data is available and accessible to hand and foot care professionals.

III. CHAPTER 1 GENERAL PROVISIONS

The information set out in this point goes beyond the scope of the information required by law. The purpose of the following information is to help you understand the **basic data protection concepts** that we consistently use in our information in accordance with the provisions of the law. The **legal grounds on which our processing is lawful** are explained to you. The **general principles of our data processing** and the **enhanced technical and organisational measures we apply** with regard to the **processing of health data** are described below, together with the additional measures we take to ensure a high level of data protection and security in line with the innovative nature of our services. Finally, for the sake of clarity, we provide an overview of the **services** provided by **MEROVA Health Zrt.**

If you are interested in the details of our individual processing under Article 13 of the Regulation, please skip to Chapter IV.

Basic data protection concepts:

For the purposes of this Guide, the definitions are set out in Article 4 of the Regulation. The main definitions are highlighted accordingly:

1. **'personal data'** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2. **"processing"** means any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
3. **"restriction of processing"** means the marking of stored personal data for the purpose of restricting their future processing;
4. **"profiling"** means any form of automated processing of personal data whereby personal data are used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict characteristics associated with that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
5. **"pseudonymisation"** means the processing of personal data in such a way that it is no longer possible to identify the natural person to whom the personal data relate without further information, provided that such further information is kept separately and technical and organisational measures are taken to ensure that no natural person who is identified or identifiable can be linked to that personal data;
6. **"filing system"** means a set of personal data, structured in any way, whether centralised, decentralised or structured according to functional or geographical criteria, which is accessible on the basis of specified criteria;
7. **'controller'** means a natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or specific criteria for the designation of the controller may also be determined by Union or Member State law;
8. **"processor"** means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
9. **"recipient"** means a natural or legal person, public authority, agency or any other body to whom or with which personal data is disclosed, whether or not a third party. Public authorities which may have access to personal data in the context of an individual investigation in accordance with Union or Member State law

data, are not recipients; the processing of such data by these public authorities must comply with the applicable data protection rules according to the purposes of the processing;

10. **"third party"** means a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data;

11. **"the data subject's consent"** means a freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject signifies, by a statement or by an act expressing his or her unambiguous consent, that he or she signifies his or her agreement to the processing of personal data concerning him or her;

12. **"data breach"** means a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

13. **"health data"** means personal data relating to the physical or mental health of a natural person, including data relating to the provision of health services to a natural person which contains information about the health of the natural person;

Ensuring the lawfulness of data processing:

1. Processing based on the consent of the data subject

1.1. Where the Company wishes to carry out processing based on consent, the data subject's consent to the processing of his or her personal data must be obtained by means of the content and information in the data request form set out in the Data Protection Policy.

1.2. Consent is also deemed to be given if the data subject ticks a box when viewing the Company's website, makes the relevant technical settings when using information society services, or makes any other statement or takes any other action which, in the relevant context, clearly indicates the data subject's consent to the intended processing of his or her personal data. Silence, ticking a box or inaction therefore does not constitute consent. The continuation of a telephone call after having been duly informed shall constitute consent.

1.3. Consent covers all processing activities carried out for the same purpose or purposes. Where processing is carried out for more than one purpose, consent shall be given for all the purposes for which the processing is carried out.

1.4. If the data subject gives his or her consent in a written statement that also relates to other matters, such as the conclusion of a sales or service contract, the request for consent must be presented in a way that is clearly distinguishable from those other matters, in a clear and easily accessible form, in clear and plain language. Any part of such a statement containing the consent of the data subject which is in breach of the Regulation shall not be binding.

1.5. The Company may not make the conclusion or performance of a contract conditional on the consent to the processing of personal data that are not necessary for the performance of the contract.

1.6. It should be possible to withdraw consent in the same simple way as it is given. The data subject may withdraw his or her consent at any time by sending an e-mail to the e-mail address given in Chapter I.

1.7. If the data subject withdraws his or her consent, the controller may no longer process his or her data. When consent is withdrawn, the controller must ensure that the data are erased, unless another legal basis allows for the processing of those data (e.g. storage requirements or the need to perform a contract). Where processing has been carried out for more than one purpose, the controller may not use the personal data for the purpose for which the data subject has withdrawn consent.

2. Processing based on the performance of a legal obligation

2.1. In the case of data processing based on a legal obligation, the scope of the data to be processed, the purpose of the processing, the duration of data storage and the recipients are governed by the provisions of the underlying legislation.

2.2 Processing based on the performance of a legal obligation is independent of the consent of the data subject, as the processing is governed by law. In such cases, the data subject must be informed before the processing starts that the processing is mandatory and must be provided with clear and detailed information on all the facts relating to the processing of his or her data, in particular the purposes and legal basis of the processing, the identity of the controller and the data processor, the duration of the processing, whether the controller is processing the data subject's personal data on the basis of a legal obligation to which the data subject is subject and the persons who may access the data. The information should also cover the rights and remedies of the data subject in relation to the processing. In the case of mandatory processing, the information may also be provided by making public a reference to the legal provisions containing the foregoing information.

3. Processing based on legitimate interest

3.1. The legitimate interests of the Company or a third party may provide a legal basis for the processing, provided that the interests, fundamental rights and freedoms of the data subject do not prevail. The reasonable expectations of the data subject based on his or her relationship with the controller should be taken into account, so that the processing of personal data for contact purposes, even for direct marketing purposes, may be considered to be based on legitimate interests.

3.2. Processing based on legitimate interests requires a balancing of interests test, in which the Company always takes into account the current circumstances and the situation of the controller and the data subjects. For the processing in the interest of the Company, the balancing of interests tests carried out separately have led to the following result: in the balancing of interests test, the Company has concluded, taking into account the conditions described for the processing in question, that the processing is justified subject to the appropriate safeguards, as set out in this Policy, without which the Company would not be able to operate competitively. In this light, the emotional impact on data subjects and the harm to their right to privacy can be considered proportionate.

4. Processing for the protection of the vital interests of the data subject or of another natural person

4.1. The protection of the vital interests of the data subject or of another natural person may also provide a legal basis for processing, given that the right to data protection is fundamental but not exclusive, and that the right to the protection of personal data is of course overridden by the right to life in matters of life and death.

5. Processing based on contractual interest

5.1. Processing may also be based on a contractual interest if it is necessary for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to entering into the contract.

Our data management principles:

In all cases, our data processing will comply with the following principles:

- We may use the personal data for the genuine, legitimate and lawful purpose or purposes specified in this Privacy Notice or other information provided at the time of collection. We will use the personal data we process only for the purposes which we informed the Data Subject of at the time of collection or which were otherwise apparent to him or her from the circumstances of collection and which he or she had a legitimate expectation of.
- We process the data lawfully and fairly and in a transparent manner for the Data Subject.
- We only process data that is strictly necessary for the purposes of data processing.
- We ensure that the data we process is accurate and up to date and we will take all reasonable steps to ensure that inaccurate data is promptly deleted and corrected. We also ask for your cooperation in this regard, as in some cases we can only ensure accuracy if you notify us of the changed data.

- In compliance with the principles of integrity and confidentiality, data processing is carried out in such a way as to ensure adequate security of personal data by applying appropriate technical and organisational measures.

The enhanced technical and organisational measures applied with regard to the management of health data

The use of MEROVA Health Zrt. services available on the <https://merova.eu> website and its subdomains necessarily involves the processing of health data. Such data include, for example, photographs uploaded from the foot, information on the health data requested and filled in on the application form, as well as the diagnosis recorded by the chiropodist and any further recommendations related to treatment. These special categories of health data are protected by data protection and health legislation and are subject to strict confidentiality and professional secrecy obligations. Both the Data Controller and the practising chiropodist will be bound by **strict confidentiality obligations** to the extent permitted by law.

In addition to all of this, we are constantly improving the technical environment surrounding our service to ensure that the data you share with us is kept as secure as possible.

We have put in place strict organisational and technical measures to ensure the security of your personal data:

- Backups are stored in multiple locations, in accordance with the highest professional standards, and only authorised persons have access to them.
- The Data Controller regularly reviews and updates its technological measures for the protection of personal data to ensure that it always uses the latest and most advanced data protection solutions.
- In all data processing activities, we take special care to limit access to data and only process data that is strictly necessary for our purposes.
- Our developers continuously monitor data management processes to detect any security threats or incidents as quickly as possible.

However, it is of the utmost importance that you also take the necessary measures to prevent unauthorised access to your user account. We therefore encourage you to

- use a strong password that you will only use in your MEROVA Health Ltd. account,
- never share your password with other people,
- restrict access to your computer, phone, tablet and browser,
- log out of your account after using MEROVA Health Zrt. services.

IV. CHAPTER 2 INFORMATION ON DATA MANAGEMENT FOR HAND AND FOOT CARE PRODUCTS

Hand and foot care pre-registration in MEROVA Health Zrt.

- (1) The registered hand and foot care professional can give his/her consent to the processing of his/her personal data by ticking the relevant box. It is prohibited to tick the box in advance.
- (2) The scope of personal data that may be processed:
 - Name of natural person (surname, first name)
 - Address
 - Your e-mail address
 - Tax number
 - Billing data
- (3) The purpose of the processing of personal data: requesting information, using the services of MEROVA Health Zrt.
- (4) The legal basis for processing is the data subject's consent [Article 6(1)(a) GDPR].

(5) Recipients and categories of recipients of personal data: employees of the Company performing tasks related to customer service, marketing activities, data processors of the Company as data processors, in particular the Company's IT, billing and online payment service provider.

(6) Duration of storage of personal data: until the withdrawal of the data subject's consent (request for erasure).

Hand and foot care registration in MEROVA Health Zrt.

(1) Hand and foot care users who register on the <https://merova.eu> website and its subdomains can give their consent to the processing of their personal data by ticking the relevant box. It is prohibited to tick the box in advance. By registering, the hand and foot care professional acknowledges that he/she will be displayed in the search engine of the specialist care provider.

(2) The scope of personal data that may be processed:

- Name of the chiroprapist (surname, first name)
- E-mail address
- Type of care (hand care, foot care, hand and foot care, master hand care, master foot care, special master foot care)
- Areas of expertise
- Evidence of qualification/training (name of training company/instructor, date of qualification)
- Location (city, postcode, street, house number)
- How to book an appointment
- Reservation phone number
- Introductory text
- Salon name, contact details (phone number, website address, location)
- Opening hours
- Contact details (e-mail, phone number)

(3) Purpose of the processing of personal data: to use the services of MEROVA Health Zrt. and to create a central database for hand and foot care professionals.

(4) Legal basis for processing: the data subject's consent [Article 6(1)(a) GDPR], which includes the consent to be displayed in the search engine of the professional care provider.

(5) Recipients and categories of recipients of personal data: employees of the Company performing tasks related to customer service, marketing, development activities, data processors of the Company as data processors, in particular the Company's IT, Marketing, online payment, billing and qualification verification service providers.

(6) Duration of storage of personal data: until the withdrawal of the data subject's consent (request for erasure).

V. CHAPTER 2 INFORMATION ON DATA PROCESSING CONCERNING CLIENTS

Client registration in the MEROVA Health Zrt. application

(1) The registering client can give his/her consent to the processing of his/her personal data by ticking the corresponding box. It is prohibited to tick the box in advance.

(2) The scope of personal data that may be processed:

- Client name (surname + first name)
- E-mail address
- To provide information about how the Data Controller can help you.

- (3) Purpose of the processing of personal data: to use the services provided by the Data Controller.
- (4) Legal basis for processing: consent of the data subject [Article 6(1)(a) GDPR].
- (5) The recipients or categories of recipients of personal data: the Company's employees performing tasks related to customer service, marketing and development activities, the Company's data processors as data processors, in particular the Company's IT and marketing service providers.
- (6) Duration of storage of personal data: until the withdrawal of the data subject's consent (request for erasure).

Registration by the client for the first session/treatment at the hand and foot care

- (1) The registering client can give his/her consent to the processing of his/her personal data by ticking the corresponding box. It is prohibited to tick the box in advance.
- (2) The scope of personal data that may be processed:
- Client name (surname + first name)
 - E-mail address
 - Address
 - Phone number
 - Information on possible allergies
 - Name of general practitioner
 - GP's telephone number
 - Date of birth (year, month, day)
 - Date of first visit

- (3) Purpose of the processing of personal data: the hand and foot care provider can record and manage the personal data concerning the client and the personal data concerning his/her condition assessment in the MEROVA Health Zrt. service used by him/her.
- (4) Legal basis for processing: consent of the data subject [Article 6(1)(a) GDPR].
- (5) The recipients or categories of recipients of personal data: employees of the Company performing tasks related to customer service, marketing, development activities, hand and foot care, data processors of the Company as data processors, in particular the IT, Marketing service provider of the Company.
- (6) Duration of storage of personal data: until the withdrawal of the data subject's consent (request for erasure).

Data processing related to health assessments by chiropodists

- (1) This data management allows hand and foot care professionals to record clients' past and current problems and their treatments. This will help hand and foot care professionals to access information about clients quickly and accurately.
- (2) The scope of personal data that may be processed:
- No (female - male - other)
 - Diabetes (have - no - diet - tablets - injection)
 - Taking blood thinners (yes - no)
 - COVID-19 infected (yes - no | when? year)
 - Have you been vaccinated against COVID-19 (yes - no | when? year)
 - Communicable disease (yes - no)
 - Pregnancy (yes - no)

- Gestational diabetes (yes - no)
- Thyroid disease (no - yes - under function, over function, autoimmune hashimoto thyroiditis)
- Anaemia (yes - no | when? year)
- Iron deficiency (yes - no - medication)
- Heart disease (yes - no)
- Heart rate regulator (yes - no)
- Back (is - is not - operated)
- Autoimmune disease (yes - no)
- Are you taking steroids (yes - no)
- HIV infected (yes - no)
- Whether you have hepatitis (yes - no)
- Gout (yes - no)
- Vasoconstriction (present - absent)
- Pre-expansion (yes - no)
- Thrombosis (yes - no)
- Blood pressure (high - low - normal)
- Body weight (light - medium - heavy)

Personal data relating to the client's feet:

- Photos of the current state of the foot
- Wear safety shoes? (yes - no)
- Skin type (Sweaty skin, Glassy skin, Smooth to loose, Dry to cracked)
- Definition of treatment:
 - Büttyök
 - Lúdtalp
 - Ankle drop
 - Harántboltozat subsidence
 - Pain in the mid-leg region (
 - Psoriasis
 - Orbánka (Yes - no - currently active)
 - Ticket
 - Calluses
 - Skin fungus
 - Wise person
 - Hen's Eye
 - Nail growth
 - Button mushrooms
 - Hammer finger
- Comment, footer status (free word)

(3) The purposes for which personal data are processed:

- The data collected during the health assessment will enable hand and foot care professionals to better understand the current health status and needs of their clients. This can help to refine and personalise hand and foot care diagnoses and treatment plans.
- Repeated health checks help hand and foot care professionals to understand the changes. For example, they allow the client's improvement to be tracked over time.
- The data collected during a health assessment can help clients understand their condition and the steps they need to take to improve or maintain it.

(4) Legal basis for processing: the data subject's consent [Article 6 (1) (a) GDPR]. By participating in the processing, the data subject (client) consents to the recording of the personal data recorded in paragraph (2) by the hand and foot care service in the MEROVA Health Zrt. system and to the display of the data on the hand and foot care service's interface and on the user's own user interface.

(5) The recipients or categories of recipients of personal data: employees of the Company performing tasks related to customer service, marketing, development activities, hand and foot care, data processors of the Company as data processors, in particular the IT service provider of the Company.

(6) Duration of storage of personal data: until the withdrawal of the data subject's consent (request for erasure).

Data management related to limb salvage diagnostics and the visualisation of the diagnosis (evaluation)

(1) Diagnostics allows users (clients) to enter their own health data, such as symptoms, lifestyle, and other relevant information. The diagnostic uses this data to assess the health status and make a diagnosis.

(2) The scope of personal data that may be processed:

- Age
- Diabetes
- Drug allergy
- Smoking
- Previous studies
- Blood glucose
- Vascular disorders
- Existence of Seb
- Pulse
- Wound location
- Shape of Seb

(3) Purpose of the processing of personal data: diagnostics can offer a diagnosis or a suggestion about the health condition to the client on the basis of the data collected. This can help users to identify health problems early and seek medical care. If the user has a MEROVA Health Ltd. user (client) account, the diagnosis will be displayed in their account. Possible consequences of not having a MEROVA Health Ltd. user account.

(4) Legal basis for processing: the data subject's consent [Article 6(1)(a) GDPR]. Possible consequences of not providing the data: diagnosis cannot be established.

(5) The recipients or categories of recipients of personal data: employees of the Company performing tasks related to customer service, marketing, development activities, hand and foot care, data processors of the Company as data processors, in particular the IT service provider of the Company.

(6) Duration of storage of personal data: until the data subject's consent is withdrawn (request for erasure). The data subject acknowledges that after the withdrawal of consent, the Controller will continue to process the diagnoses and data in an anonymised form for the purposes of statistical analysis, data analysis and research.

Data management related to the use of SOS Line

(1) If, due to your condition, you feel that you need immediate help or a specific answer to a specific question, you can contact one of the participating doctors using the in-app SOS Line. In order to provide a meaningful response, the participating doctor will need to handle your contact and health information that is part of your message.

(2) The personal data that may be processed include: e-mail address, health and other personal data provided by the data subject. **Please do not provide more personal data about yourself or other persons in your request than is strictly necessary.**

(3) Purpose of the processing: to answer the data subject's questions and, where applicable, to protect his or her vital interests (life and health).

(4) Legal basis for processing: the data subject's consent [Article 6(1)(a) GDPR]. Possible consequences of not providing the data: communication is not possible without the data subject's identification and contact details, and without the necessary health data, the question cannot be answered.

(5) Recipients and categories of recipients of personal data: when using the SOS Line, the Data Controller does not come into contact with the data subject's data, and is therefore not a data controller in respect of such data. The data controller of the data subject will be the selected doctor to whom the message is sent.

(6) Duration of storage of personal data: as a general rule, the data subject's data will be deleted when his or her consent is withdrawn.

VI. CHAPTER 2 INFORMATION ON DATA MANAGEMENT IN RELATION TO OROVANS

Medical registration in the MEROVA Health Zrt. web application

(1) If you are a doctor using the Data Controller's web application, you must register. The primary reasons for this are the legal restrictions (2006 XCVIII. tv.) on the advertising and recommendation of certain medical devices and medicines. In order to access the professional recommendations available through the application, you must provide proof of your medical qualification. Registration is necessarily preceded by a registration code application process, but no additional data is collected compared to registration.

(2) The scope of personal data that may be processed:

- Surname
- Surname
- Username
- E-mail address
- Password
- Specialisation (position, job title)
- AEKK seal number

(3) Purpose of processing: to identify the data subject, to verify his/her professional qualifications in accordance with legal obligations.

(4) Legal basis for processing: consent of the data subject [Article 6(1)(a) GDPR].

(5) The recipients or categories of recipients of personal data: the Company's employees performing tasks related to customer service, marketing and development activities, the Company's data processors as data processors, in particular the Company's IT and marketing service providers.

(6) Duration of storage of personal data: until the withdrawal of the data subject's consent (request for erasure).

Medical registration in the specialist care search function

(1) If you, as a doctor, would like to appear on the MEROVA Health Zrt. platform as a service provider, you can request this via the e-mail sent to the Data Controller.

(2) The scope of personal data that may be processed:

- Full name (surname, first name)

- Titulusa
- Introductory text
- E-mail address
- Type of catering
- Areas of expertise
- Location (city, postcode, street, house number)
- How to book an appointment
- Reservation phone number
- Introductory text
- Name and contact details (phone number, website address, location)
- Ordering time
- Contact details (e-mail, phone number)

(3) Purpose of data processing: listing doctors in the specialist care search engine allows clients to easily communicate with doctors and contact them appropriately. This can assist in working with doctors and providing care to clients.

(4) Legal basis for processing: consent of the data subject [Article 6(1)(a) GDPR].

(5) Recipients and categories of recipients of personal data: employees of the Company performing tasks related to customer service, marketing, development activities, data processors of the Company as data processors, in particular the Company's IT, Marketing, online payment and billing service providers.

(6) Duration of storage of personal data: until the withdrawal of the data subject's consent (request for erasure).

VII. CHAPTER 2 INFORMATION ON DATA PROCESSING BY THE COMPANY

Customer data: managing data of contracting partners, contacts

(1) The Company may process the name, name at birth, date of birth, mother's name, address, tax identification number, tax number, entrepreneur's ID card number, address, address of the registered office, address of the establishment, telephone number, e-mail address, website address, bank account number of the natural person who has a contractual relationship with the Company for the purpose of preparing, concluding, performing, terminating or granting a contractual benefit, in summary, for the purpose of the performance of the contract, in order to support the economic processes in the common interest. Such processing is also lawful if it is necessary for the purposes of taking steps at the request of the data subject prior to the conclusion of the contract. Recipients of personal data: the Company's employees performing customer service tasks, employees performing accounting, tax, business processing tasks and IT data processors. The period of storage of personal data is 8 years after the termination of the contract in view of the long-term business relationship of the Company.

(2) The legal basis for the processing of the data of the natural person contracting party provided in the contract for accounting and tax purposes is the fulfilment of a legal obligation, in this context the data storage period is 8 years.

(3) The Company shall process the personal data of the natural person acting on behalf of the legal entity contracting with it - the person signing the contract - provided in the contract, as well as his/her address, e-mail address and telephone number, online identifier for the purposes of contract preparation, contact, exercise of rights and obligations arising from the contract - in summary, support of economic processes in the common interest - for the purpose of contract performance. The storage period of these data is 8 years after the termination of the contract. In the case of processing based on legitimate interest, the data subject has the specific right to object to the processing.

(4) The name, address, telephone number, e-mail address, online identifier of the natural person - not a signatory - indicated as a contact person in the contract concluded with the Company for the purpose of contacting, exercising rights and obligations arising from the contract - in summary, to support the economic processes in the common interest -

for the performance of a contract, taking into account that the contact person is in an employment relationship with the contractor, so that this processing does not adversely affect the rights of the data subject. The Contracting Party declares that it has informed the contact person concerned of the processing relating to his capacity as a contact person. The storage period of this data shall be 8 years after the contact has been established.

(5) For all data subjects, the recipients of the personal data are: the Company's senior management, employees and contact persons performing customer service tasks, the Company's data processors, in particular employees and data processors performing IT, accounting, tax, business processing tasks.

(6) The personal data may be transferred for processing to the accounting office appointed by the company for tax purposes, to the Hungarian Postal Service or the appointed courier service for postal delivery, to the company's asset protection officer for asset protection purposes, to the company's data processors, in particular IT data processors.

(7) The processing is lawful if it is necessary in the context of a contract or the intention to conclude a contract (GDPR Preamble 44) if it is necessary for the purposes of taking steps at the request of the data subject prior to the conclusion of the contract (GDPR Article 6 (1) b)). When making or receiving an offer, the Company is obliged to inform the offeror or the offeree of the offer.

Data management in the Company's webshop

(1) A purchase in the webshop operated by the Company is considered a contract, taking into account Article 13/A of Act CVIII of 2001 on certain issues of electronic commerce services and information society services, and Government Decree 45/2014 (26.II.) on the detailed rules of contracts between consumers and businesses.

(2) The Company may process the natural personal identification data and address of the customer registering in the webshop for the purpose of creating, defining the content of, amending, monitoring the performance of, invoicing the fees arising from, and enforcing claims related to the contract for the provision of information society services, in accordance with Article 13/A (1) of Act CVIII of 2001, and the telephone number, e-mail address, bank account number, online identifier of the customer registering in the webshop, and for the purpose of consent.

(3) For billing purposes, the Company may process personal data relating to the use of information society services, address, delivery address, as well as data relating to the time, duration and place of use of the service, pursuant to Article 13/A (2) of Act CVIII of 2001.

(4) The recipients and categories of recipients of personal data: employees of the Company performing tasks related to customer service, payment, transport, marketing activities, data processors of the Company, in particular employees of the company performing tax and accounting tasks for the purpose of fulfilling tax and accounting obligations, employees of the Company's IT service provider for the purpose of providing hosting services, employees of the company providing online payment services for the purpose of providing online payment, employees of the courier service for the purpose of providing delivery data (name, address, telephone number).

(5) Duration of the processing of personal data: until the registration/service is completed or until the data subject's consent is withdrawn (request for deletion), in case of a purchase, 8 years after the year of purchase and from the date of performance of the contract.

Data processing related to the newsletter service

(1) By ticking the relevant box, the natural person registering for the newsletter service on the website, acting on behalf of a legal entity, acknowledges that sending newsletters, marketing enquiries, information

For the purpose of sending materials, the Company will process your data on the basis of your consent until the service is active or until a request for cancellation (unsubscribe request sent by e-mail) is received. It is prohibited to tick the box. When subscribing, the Privacy Notice (Annex 2) must be made available via a link. The data subject may unsubscribe from the newsletter at any time by giving a written or e-mail declaration. In such a case, all data of the objector shall be deleted immediately.

(2) The scope of personal data processed: the subscriber's e-mail address.

(3) Purpose of the processing of personal data:

- Send a newsletter about the Company's services
- Sending promotional material, information material

(4) Legal basis for processing: the data subject's consent. [Article 6(1)(a) GDPR]. Legal consequence of not giving consent: the service will not be provided.

(5) The recipients or categories of recipients of personal data: the Company's employees performing tasks related to customer service and marketing activities, the Company's data processors in particular, the mailing, marketing and IT service providers.

(6) Duration of the storage of personal data: until the newsletter service is maintained or until the data subject's consent is withdrawn (request for deletion).

(7) The data subject acknowledges that the provision of data is not a prerequisite for the conclusion of a contract and is not obliged to provide personal data. Failure to provide the data may result in the non-supply of the newsletter.

Social media data management (Facebook, YouTube and LinkedIn)

(1) Our Company has limited control over the data management of social media platform operators. Where we can influence and parameterise it, we will facilitate its privacy-compliant processing to the extent that we are able to do so. **In most cases, however, we have no control over the operator's activities, so we have no information about exactly what data is processed.**

Facebook data management Privacy Policy a following at located at
<https://www.facebook.com/privacy/explanation/>

YouTube's privacy policy can be found at: <https://policies.google.com/privacy?hl=hu> **LinkedIn's** privacy policy can be found at: <https://www.linkedin.com/legal/privacy-policy>

(2) The Data Controller manages its own page on Facebook. The data subject can subscribe to news feeds posted on the message board of the Facebook page by clicking on the "like" or "like" link on the pages. To be able to contact the Data Controller via Facebook, you must be logged in. For this purpose, Facebook also requests, stores and processes personal data. The Controller has no control over the type, scope and processing of this data and does not receive personal data from the Facebook operator. On Facebook pages, the Data Controller processes the personal data of followers on the basis of the voluntary consent of the followers, which is deemed to have been given by the fact that the person concerned likes, follows or comments on the page or posts. The data subject declares that he/she is over 16 years of age when requesting services on the Facebook page of the Controller. A person under 16 years of age shall, pursuant to Article 8(1) of the GDPR, require the consent of his or her legal representative in order for his or her declaration of consent to the processing to be valid. The controller is not in a position to verify the age and entitlement of the person giving consent, so the data subject warrants that the data he or she has provided is accurate.

(3) Purpose of data processing: to provide information on current information, news concerning the Data Controller, advertising on social media, presentation and promotion of services. The Facebook page is used by the Data Controller for marketing purposes, in order to inform interested parties about its services and to enable them to contact the Data Controller.

(4) Legal basis for processing: the data subject's voluntary consent (in accordance with the Facebook, YouTube and LinkedIn privacy policies)

(5) Data subject: name of the data subject; data subjects: users of the social media platform

(6) Duration of data processing: the data subject can unsubscribe from the Facebook page of the Data Controller by clicking on the "dislike" or "do not like" button or delete unwanted content through the settings of the message board. The active status of the service

(7) Recipients: employees of the data controller performing tasks related to customer service and marketing, data processors of the Company as data processors, in particular the IT service provider of the Company.

Data processing related to the organisation of a prize draw

(1) If the company organises a gift draw (Article 23 of Act XXXIV of 1991), it may process the name, address, telephone number, e-mail address, online identifier and tax identification number of the natural person concerned on the basis of his or her consent. Participation in the game is voluntary. Consent to the processing of personal data is deemed to have been given by accepting this policy and participating in the game.

(2) The purposes of processing personal data are: to identify and notify the winner of the competition, to send the prize, to contact you for marketing purposes, to send you information material.

(3) Legal basis for processing: consent of the data subject [Article 6(1)(a) GDPR].

(4) The recipients or categories of recipients of personal data are: the Company's employees performing marketing and customer service tasks, the Company's data processors as data processors, in particular the Company's IT service provider, accounting employees, courier service employees and the other data processors named in the Company's other data processing policies. Subject to explicit consent, the Company may display the names of the winners on its Facebook page, drawing the attention of the data subjects to the fact that the news may be shared by others in the privacy notice. On social networking sites, implicit behaviour may be considered as consent.

(5) Duration of retention of personal data: 5 years, 8 years for the retention of accounting records in the case of winners.

Data processing for direct marketing purposes

(1) Unless otherwise provided by a separate law, advertising may be communicated to a natural person as the recipient of the advertising by direct solicitation, in particular by electronic mail or other equivalent means of individual communication, with the exception of the provisions of Act XLVIII of 2008, only if the recipient of the advertising has given his/her prior, clear and express consent. The processing of personal data for direct marketing purposes may also be considered to be based on legitimate interest according to paragraph 47 of the GDPR preamble.

(2) The scope of personal data that the Company may process for the purpose of advertising mailing enquiries: the name, address, telephone number, e-mail address, online identifier of the natural person.

(3) The purpose of the processing of personal data is to carry out direct marketing activities related to the Company's activities, i.e. sending advertising publications, newsletters, current offers in printed (postal) or electronic form (e-mail) on a regular or periodic basis to the contact details provided at the time of registration.

(4) Legal basis for processing: consent of the data subject [Article 6(1)(a) GDPR].

(5) The recipients or categories of recipients of personal data: the Company's employees performing customer service tasks, the Company's data processors as data processors, in particular the Company's IT, Marketing, Newsletter service provider, and in the case of postal delivery, the Postal Service's employees.

(6) Duration of storage of personal data: until the withdrawal of the data subject's consent (request for erasure).

Data management related to customer satisfaction

(1) This data management enables the Data Controller to understand the needs and feedback of users (hand and foot care professionals, clients, doctors) and to improve its services and business processes on this basis.

(2) The scope of personal data that may be processed:

- data necessary to identify the data subject
- evaluations by the data subject of the quality of the controller's services
- other feedback, opinions of the person concerned

(3) Purpose of data processing: to use user feedback to develop and improve MEROVA Health Zrt. services in order to better meet the needs of users.

(4) Legal basis for processing: consent of the data subject [Article 6(1)(a) GDPR].

(5) The recipients or categories of recipients of personal data: the Company's employees performing tasks related to customer service, marketing and development activities, the Company's data processors as data processors, in particular the Company's IT and marketing service providers.

(6) Duration of storage of personal data: the data controller may store the data for a period of five years according to the general limitation period of the Civil Code.

Management of recruitment data, applications, CVs

(1) The personal data that may be processed: name, date and place of birth, mother's name, address, photograph, telephone number, e-mail address, data concerning professional history, experience, training, education and qualifications of the natural person.

If, following the application of the data subject, a personal interview of the data subject takes place, the Data Controller shall make a record of it, the content of which shall also be considered personal data.

(2) Purpose of the processing of personal data:

- identification of the data subject,
- the processing by the Data Controller of the data subject's job application to the Data Controller
- the assessment of,
- the participation of the person concerned in the selection procedure,
- the selection of a data subject with the appropriate skills and professional experience for the position advertised by the Data Controller,
- contacting the person concerned and maintaining contact during the selection process,
- to offer the data subject a job offer at a later stage, if the data subject is not selected by the Data Controller for the advertised job position.

(3) Legal basis for processing: by submitting a job application, the data subject consents (Article 6(1)(a) GDPR) to the processing of his/her personal data (deemed to be provided when the application is sent).

(4) The recipients or categories of recipients of personal data: managers entitled to exercise rights as employers in the Company, employees performing labour-related tasks, IT data processors.

(5) Duration of storage of personal data: the Data Controller shall delete the personal data of the data subject until 31 December of each year following the submission of the job application or until the withdrawal of the data subject's consent. The Controller shall delete the documents sent by the data subject without delay at the request of the data subject. If the data subject requests the deletion of his or her personal data before the end of the selection process, the data subject shall not be able to participate in the selection process.

VIII. CHAPTER 2 INFORMATION ON DATA PROCESSING BASED ON LEGAL OBLIGATIONS

Data processing for tax and accounting obligations

(1) The Company processes the data of natural persons contacting it for the purposes of fulfilling its legal obligations, tax and accounting obligations (accounting, taxation), as defined by law. A kezelt adatok az általános forgalmi adóról szóló 2017. évi CXXVII. tv. 169.§, és 202.§-a alapján különösen: adószám, név, cím, adózási státusz, a számvitelről szóló 2000. évi C. törvény 167.§-of the Act of 2000 on Accounting: name, address, designation of the person or organisation ordering the transaction, signature of the person ordering the transaction and the person certifying the execution of the order, and, depending on the organisation, the signature of the controller; on the stock movement vouchers and cash management vouchers: signature of the recipient, on the counterfoils: signature of the payer, and under Act CXVII of 1995 on Personal Income Tax: tax identification number.

(2) Data processing related to the keeping of the driver's logbook and journey log (in relation to vehicles used by several authorised persons): the Company processes the data specified by law (name of the driver, type of vehicle, registration number, date of the journey, purpose of the journey, route taken, name of the business partner visited) for the purposes of legal obligations, cost accounting, supporting documents, tax assessment and fuel saving. The relevant legislation is Act No. CXVII of 1995 (Tax Act), § 27/2/, Annex 3, item 6 and Annex 5, item 7.

(3) The period of storage of personal data is 8 years after the termination of the legal relationship giving rise to the legal basis.

(4) Recipients of personal data: employees and data processors of the Company performing tax, accounting, payroll and social security functions.

Payer data processing

(1) The Company processes the personal data of the data subjects - employees, their family members, employees, other beneficiaries - with whom it has a relationship as a paying agent (Act 2017:CL on the Order of Taxation (Art.) 7.§ 31.) for the purposes of fulfilling its legal obligations, tax and contribution obligations (tax, advance tax, contributions, payroll, social security, pension administration). The scope of the data processed is defined in Art. Article 50 of the Act defines the data processed, specifically highlighting the following: the natural person's natural person identification data (including previous name and title), gender, nationality, tax identification number, social security number (social security number). If the tax laws impose a legal consequence, the Company may process data relating to employees' membership of health (Section 40 of the Social Security Act) and trade unions (Section 47(2) b) of the Social Security Act) for the purposes of meeting tax and contribution obligations (payroll accounting, social security administration).

(2) The period of storage of personal data is 8 years after the termination of the legal relationship giving rise to the legal basis.

(3) Recipients of personal data: employees and data processors of the Company performing tax, payroll, social security (payroll) functions.

Data management of documents of lasting value under the Archives Act

(1) The Company shall, in the performance of its legal obligation, manage the documents of permanent value pursuant to Act LXVI of 1995 on public records, public archives and the protection of private archival material (Archives Act)

in order to ensure that a part of the Society's archival material of lasting value is preserved intact and in a usable condition for future generations. Duration of storage: until transfer to the public archives.

(2) The recipients of the personal data are: the head of the Company, the employees of the Company performing document management and archiving, the staff of the public archives.

IX. CHAPTER 2 VISITOR DATA MANAGEMENT ON THE COMPANY'S WEBSITE - INFORMATION ON THE USE OF COOKIES

1. Visitors to the website must be informed of the use of cookies on the website and their consent must be requested, with the exception of session cookies, which are technically necessary.

A cookie is a small text file that is stored in the long-term storage (HDD, SSD) of the data subject's computer or mobile device for the expiry period set in the cookie and is reactivated on subsequent visits. Its purpose is to record data relating to the visit and personal preferences, but this data cannot be linked to the visitor personally. It helps to design a user-friendly website and to enhance the online experience of the Data Subject. If the Data Subject does not consent to the use of cookies by the Data Processor, he/she must discontinue using the website. Possible consequences of not providing the data: not full use of the website services.

Purpose of processing: to improve the user experience, to store the personal preferences of the

data subject Legal basis for processing: voluntary consent of the data subject [Article 6(1)(a)

GDPR].

Data subject: the Data Controller stores all analytical information without name or other personal data

Duration of processing: the data subject can delete cookies stored on his/her computer or mobile phone at any time through the settings of his/her browser

2. Detailed information about cookies

2.1. A cookie is a piece of data that the visited website sends to the visitor's browser (in the form of a variable name value) so that it can store it and later load its content on the same website. A cookie can have a validity period, valid until the browser is closed, or indefinitely. In subsequent HTTP(S) requests, the browser will also send this data to the server. In this way, the data on the user's computer is modified.

2.2. Modern website services inherently require cookies, the function of which is to identify a user (for example, that he or she has accessed the site) and to manage him or her accordingly, even identifying him or her on subsequent returns. The danger is that the user may not always be aware of this and may be tracked by the website operator or other service provider whose content is embedded in the site (e.g. Facebook, Google Analytics), thereby creating a profile of the user, in which case the cookie content may be considered personal data.

2.3. Types of cookies:

2.3.1. Technically necessary session cookies: without which the site would simply not function, these are needed to identify the user, e.g. to manage whether they have logged in, what they have added to the shopping cart, etc. This is typically a session ID, the rest of the data is stored on the server, which is more secure. There is a security aspect, if the session cookie value is not generated correctly then there is a risk of a session hijacking attack, so it is imperative that these values are generated correctly. Other terminology calls session cookies all cookies that are deleted when you exit the browser (a session is a browser session from start to exit).

2.3.2. Usage cookies: these are cookies that remember the user's choices, for example, how the user wants to view the site. These types of cookies are essentially the preferences data stored in the cookie.

2.3.3. Performance cookies: although they have little to do with "performance", this is usually the name given to cookies that collect information about the user's behaviour, time spent on a website, clicks and clicks. These are typically third-party applications (e.g. Google Analytics, AdWords, or Yandex.ru cookies). They can be used to profile the visitor.

You can find out about Google Analytics cookies here:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

You can find out about Google AdWords cookies here:

<https://support.google.com/adwords/answer/2407785?hl=hu>

2.4. You are not obliged to accept the use of cookies or to allow them. You can reset your browser settings to reject all cookies or to indicate when a cookie is being sent. While most browsers automatically accept cookies by default, these can usually be changed to prevent automatic acceptance.

To find out about cookie settings for the most popular browsers, click on the links below

- Google Chrome: <https://support.google.com/accounts/answer/61416?hl=hu>
- Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>
- Microsoft Internet Explorer 11: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-11>
- Microsoft Internet Explorer 10: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-10-win-7>
- Microsoft Internet Explorer 9: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-9>
- Microsoft Internet Explorer 8: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-8>
- Microsoft Edge: <http://windows.microsoft.com/hu-hu/windows-10/edge-privacy-faq>
- Safari: <https://support.apple.com/hu-hu/HT201265>

That said, please note that certain website features or services may not function properly without cookies.

3. Information about the cookies used on the Company's website and the *data generated during the visit*

3.1. Data processed during the visit: our Company's website may record and process the following data about the visitor and the device used for browsing during the use of the website:

- the IP address used by the visitor,
- the browser type,
- the characteristics of the operating system of the browsing device (language set),
- date of visit,
- the (sub)page, feature or service visited.
- click.

This data is kept for up to 90 days and may be used primarily to investigate security incidents.

3.2. Cookies used on the website

3.2.1. Technically necessary session cookies

The purpose of the processing: to ensure the proper functioning of the website. These cookies are necessary to enable visitors to browse the website, to use its functions smoothly and fully, to use the services available through the website, including, in particular, to note the actions carried out by the visitor on the pages concerned *or to identify the logged-in user* during a visit. The duration of the processing of these cookies is limited to the current visit of the visitor, and this type of cookie is automatically deleted from his/her computer at the end of the session or when the browser is closed.

The legal basis for this data processing is Article 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elkertv.), according to which the service provider may process personal data that are technically indispensable for the provision of the service. The service provider must, other things being equal, choose and in any case operate the means used in the provision of the information society service in such a way that personal data are processed only if absolutely necessary for the provision of the service and for the fulfilment of the other purposes specified in this Act, but in this case only to the extent and for the duration necessary.

Cookies are essential for the functioning of the website:

Name	Use	Domain	Expiry time	Type
cc_cookie	The cookie is set when the user accepts the use of cookies. Scope of data processed: user's cookie preferences storage	merovahealth.com , merova.eu	6 months	HTTP
_greaptcha	When reCAPTCHA is performed, it sets a required cookie (_GRECAPTCHA) for risk analysis.	google.com	6 months	HTTP

Cookies are essential for the display of the website content:

Name	Use	Domain	Expiry time	Type
test_cookie	Google uses cookies to test for placability.	doubleclick.net	15 min	HTTP
VISITOR_INFO1_LIVE	YouTube uses it to display embedded posts.	youtube.com	10 years	HTTP
YSC	YouTube uses embedded to display the entry.	youtube.com	Working Agenda	HTTP

3.2.1. Cookies to facilitate use:

These remember the user's choices, such as what form the user wants the page to take. These types of cookies are essentially the preferences data stored in the cookie.

The legal basis for processing is the consent of the visitor.

Purpose of data processing: to increase the efficiency of the service, to improve the user experience, to make the use of the website more convenient.

This data is typically on the user's computer, the website just accesses it and recognises the visitor.

Statistical cookies used to analyse website performance:

Name	Use	Domain	Expiry time	Type
AMP_TOKEN, _gac_, _gid	Google Analytics tracking cookies that help us collect information about how a visitor use the website.	merovahealth.com , merova.eu	2 years	HTTP

_gat	Controlling request backlog for Google Analytics cookie used for the purpose of.	merovahealth.com , merova.eu	1 day	HTTP
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3.2.2. Performance cookies:

They collect information about the user's behaviour, time spent on the website visited, clicks.

Legal basis for processing: consent of the data subject.

Purpose of data processing: analysis of the website, sending advertising offers.

Marketing cookies for better communication and information:

Name	Use	Domain	Expiry time	Type
collect	Used to send data about the visitor's device and behaviour to Google Analytics. Tracks the visitor's devices and marketing between channels.	google.com	Working Agenda	PIXEL
CONSENT	Google Analytics tracking cookie that helps us collect information about how visitors use the site.	google.com	Permanent	HTTP
HSID	This cookie is set by embedded videos. It is used to register anonymous statistical data. For example, how many times a video has appeared and what settings it is played with. Sensitive data is not collected until you sign in to your Google Account, in which case your choices are linked to your account, for example when you click the "Like" button below a video.	google.com	718 days	HTTP
NID	Register a unique identifier that identifies the returning user device. The identifier is	google.com	6 months	HTTP

	used for targeted advertising.			
OTZ	"OTZ" is a cookie used by Google Analytics to allow aggregated analysis of visitors to websites.	google.com	16 days	HTTP
SAPISID	<p>This cookie is set by embedded videos. It is used to register anonymous statistical data.</p> <p>For example, how many times a video has appeared and what settings it is played with. Sensitive data is not collected until you sign in to your Google Account, in which case your choices are linked to your account, for example when you click the "Like" button below a video.</p>	google.com	2 years	HTTP
APISID	<p>This cookie is set by embedded videos. It is used to register anonymous statistical data.</p> <p>For example, how many times a video has appeared and what settings it is played with. Sensitive data is not collected until you sign in to your Google Account, in which case your choices are linked to your account, for example when you click "Like" button during a video.</p>	google.com	718 days	HTTP
SID	<p>This cookie is set by embedded videos.</p> <p>Anonymous statistics is involved in the registration of.</p>	google.com	2 years	HTTP

	<p>For example, how many times a video has appeared and what settings it is played with. Sensitive data is not collected until you sign in to your Google Account, in which case your choices are linked to your account, for example when you click "Like" button during a video.</p>			
SIDCC	<p>A security cookie that protects user data from unauthorised access.</p>	google.com	3 months	HTTP
SSID	<p>This cookie is set by embedded videos. It is used to register anonymous statistical data.</p> <p>For example, how many times a video has appeared and what settings it is played with. Sensitive data is not collected until you sign in to your Google Account, in which case your choices are linked to your account, for example when you click "Like" button during a video.</p>	google.com	3 months	HTTP
_fbp	<p>Facebook uses it to provide various advertising products, such as real-time offers from third-party advertisers.</p>	merovahealth.com	3 months	HTTP
fr	<p>Facebook uses it to provide various advertising products, such as real-time offers from third-party advertisers.</p>	facebook.com	3 months	HTTP

tr	Facebook uses it to provide various advertising products, such as real-time offers from third-party advertisers.	facebook.com	session	Pixel
google_experiment_mod#	Google uses AdSense to research the effectiveness of your ads through its various services.	google.com	permanent	HTTP
pagead/1p-conversion/#	This cookie is used by Google AdWords to contact visitors who are likely to convert based on their online behaviour.	google.com	session	Pixel
pagead/1p-user-list/#	This cookie is used by Google AdWords to contact visitors who are likely to convert based on their online behaviour.	google.com	session	Pixel
1P_JAR	This cookie collects website statistics and measures conversions according to google.com's privacy policy.	google.com	1 month	HTTP
ads/ga-audiences	Google AdWords uses Google AdWords to find visitors who, based on their online behaviour conversion is likely.	google.com	session	Pixel

ANID	Google uses this cookie for its advertising services, which is stored by the browser under the google.com domain.	google.com	376 days	HTTP
IDE	Google uses DoubleClick to register and track users' activity after they have viewed or clicked on an advertiser's ad, to measure its effectiveness and to provide targeted advertising to for the user.	google.com	13 months	HTTP
S	The "S" cookie may collect certain services that help improve services, including the most frequently visited pages and whether users receive error messages on certain pages. This cookie is also used to anonymously measure the effectiveness of PPC (pay per click) and affiliate advertising can be used.	google.com	session	HTTP

**X. CHAPTER 2
INFORMATION ON THE RIGHTS OF THE PERSON CONCERNED**

I. A brief summary of the data subject's rights:

1. Transparent information, communication and facilitation of the exercise of data subject rights
2. Right to prior information - when personal data are collected from the data subject
3. Information to the data subject and the information to be provided to him or her where the personal data have not been obtained by the controller from him or her
4. Right of access of the data subject
5. The right to rectification
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15. The right to lodge a complaint with a supervisory authority (right to official redress)
16. Right to an effective judicial remedy against the supervisory authority
17. The right to an effective judicial remedy against the controller or processor

II. Your rights as a data subject in detail:

1. Transparent information, communication and facilitation of the exercise of data subject rights

1.1. The controller shall provide the data subject with all information and any particulars relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form, in clear and plain language, in particular in the case of any information addressed to children. The information shall be provided in writing or by other means, including, where appropriate, by electronic means. At the request of the data subject, information may be provided orally, provided that the identity of the data subject has been verified by other means.

1.2. The controller must facilitate the exercise of the data subject's rights.

1.3. The controller shall inform the data subject, without undue delay and in any event within one month of receipt of the request, of the measures taken in response to the request to exercise his or her rights. This time limit may be extended by a further two months under the conditions laid down in the Regulation, of which the data subject shall be informed.

1.4. If the controller fails to act on the data subject's request, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of the possibility for the data subject to lodge a complaint with a supervisory authority and to exercise his or her right of judicial remedy.

1.5. The data controller shall provide the information and the information and action on the rights of the data subject free of charge, but may charge a fee in the cases provided for in the Regulation.

The detailed rules can be found under Article 12 of the Regulation.

2. Right to prior information - when personal data are collected from the data subject

2.1. The data subject shall have the right to be informed of the facts and information relating to the processing before the processing starts. In this context, the data subject shall be informed:

- a) the identity and contact details of the controller and its representative,
- b) the contact details of the Data Protection Officer (if any),
- c) the purposes for which the personal data are intended to be processed and the legal basis for the processing,
- d) in the case of processing based on legitimate interests, the legitimate interests of the controller or a third party,
- e) the recipients to whom the personal data are disclosed and the categories of recipients, if any;
- (e) where applicable, the fact that the controller intends to transfer the personal data to a third country or an international organisation.

2.2. To ensure fair and transparent processing, the controller must provide the data subject with the following additional information:

- a) the duration of the storage of personal data or, where this is not possible, the criteria for determining that duration;
- b) the right of the data subject to request the controller to access, rectify, erase or restrict the processing of personal data concerning him or her and to object to the processing of such personal data, and the right to data portability;
- c) in the case of processing based on the data subject's consent, the right to withdraw consent at any time, without prejudice to the lawfulness of the processing carried out on the basis of consent before its withdrawal;
- d) the right to lodge a complaint with a supervisory authority;
- e) whether the provision of the personal data is based on a legal or contractual obligation or is a precondition for the conclusion of a contract, whether the data subject is under an obligation to provide the personal data and the possible consequences of not providing the data;
- f) the fact of automated decision-making, including profiling, and, at least in these cases, the logic used and clear information about the significance of such processing and the likely consequences for the data subject.

2.3. If the controller intends to further process personal data for a purpose other than that for which they were collected, the controller must inform the data subject of that other purpose and of any relevant additional information before further processing.

The detailed rules on the right to prior information are set out in Article 13 of the Regulation.

3. Information to the data subject and the information to be provided to him or her where the personal data have not been obtained by the controller from him or her

3.1. If the controller has not obtained the personal data from the data subject, the data subject must be informed by the controller no later than one month after the personal data are obtained; if the personal data are used for the purpose of contacting the data subject, at least at the time of the first contact with the data subject; or, if the data are likely to be disclosed to another addressee, no later than the time of the first disclosure of the personal data, in accordance with the provisions of Article 2. the facts and information referred to in point (2), the categories of personal data concerned and the source of the personal data and, where applicable, whether the data originate from publicly available sources.

3.2. For further rules, see point 2 (Right to prior information) above.

The detailed rules for this information are set out in Article 14 of the Regulation.

4. Right of access of the data subject

4.1. The data subject has the right to obtain from the controller feedback as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and related information described in points 2-3 above (Article 15 of the Regulation).

4.2. Where personal data are transferred to a third country or an international organisation, the data subject is entitled to be informed of the appropriate safeguards for the transfer in accordance with Article 46 of the Regulation.

4.3. The controller must provide the data subject with a copy of the personal data which are the subject of the processing. For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs.

Detailed rules on the right of access of the data subject are laid down in Article 15 of the Regulation.

5. The right to rectification

5.1. The data subject shall have the right to obtain from the Data Controller, upon his or her request and without undue delay, the rectification of inaccurate personal data relating to him or her.

5.2. Taking into account the purpose of the processing, the data subject has the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

These rules are set out in Article 16 of the Regulation.

6. Right to erasure ("right to be forgotten")

6.1. The data subject shall have the right to obtain from the controller the erasure of personal data relating to him or her without undue delay at his or her request, and the controller shall be obliged to erase personal data relating to him or her without undue delay if:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing,
- d) the personal data have been unlawfully processed;
- e) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- f) personal data are collected in connection with the provision of information society services directly to children.

6.2. The right to erasure cannot be exercised if the processing is necessary

- a) to exercise the right to freedom of expression and information;
- b) to comply with an obligation under Union or Member State law to which the controller is subject or to carry out a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) on grounds of public interest in the field of public health;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where the right of erasure would be likely to render such processing impossible or seriously jeopardise it; or
- e) to bring, enforce or defend legal claims.

Detailed rules on the right to erasure are set out in Article 17 of the Regulation.

7. Right to restriction of processing

7.1. Where processing is restricted, such personal data, except for storage, may be processed only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State.

7.2. The data subject shall have the right to obtain, at his or her request, the restriction of processing by the Controller if one of the following conditions is met:

- a) the data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the Controller to verify the accuracy of the personal data;
- b) the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- c) the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- d) the data subject has objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the controller override those of the data subject.

7.3. The data subject shall be informed in advance of the lifting of the restriction on processing.

The relevant rules are set out in Article 18 of the Regulation.

8. Obligation to notify the rectification or erasure of personal data or restriction of processing

The controller shall inform each recipient to whom or with which the personal data have been disclosed of any rectification, erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort. The controller shall inform the data subject, at his or her request, of these recipients.

These rules can be found under Article 19 of the Regulation.

9. The right to data portability

9.1. Under the conditions set out in the Regulation, the data subject has the right to receive personal data relating to him or her which he or she has provided to a controller in a structured, commonly used, machine-readable format and the right to transmit those data to another controller without hindrance from the controller to whom the personal data have been provided, if:

- a) the processing is based on consent or a contract; and
- b) the processing is carried out by automated means.

9.2. The data subject may also request the direct transfer of personal data between controllers.

9.3. The exercise of the right to data portability shall be without prejudice to Article 17 of the Regulation (Right to erasure ("right to be forgotten"). The right to data portability shall not apply where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. This right shall not adversely affect the rights and freedoms of others.

The detailed rules are set out in Article 20 of the Regulation.

10. The right to protest

10.1. The data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to processing of his or her personal data based on the public interest, the performance of a public task (Article 6(1)(e)) or a legitimate interest (Article 6(f)), including profiling based on those provisions. In such a case, the controller may 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.

10.2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing. If the data subject objects to the processing of personal data for direct marketing purposes, the personal data may no longer be processed for those purposes.

10.3. These rights must be explicitly brought to the attention of the data subject at the latest at the time of the first contact with the data subject and the information must be clearly displayed separately from any other information.

10.4. The data subject may also exercise the right to object by automated means based on technical specifications.

10.5. Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject shall have the right to object, on grounds relating to his or her particular situation, 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.

The relevant rules are set out in Article 21 of the Regulation.

11. Automated decision-making on individual cases, including profiling

11.1. The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

11.2. This entitlement does not apply in the case of a decision to:

- a) necessary for the conclusion or performance of a contract between the data subject and the controller;
- b) is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or
- c) is based on the explicit consent of the data subject.

11.3. In the cases referred to in points (a) and (c), the controller shall take appropriate measures to safeguard the rights, freedoms and legitimate interests of the data subject, including at least the right to obtain human intervention by the controller, to express his or her point of view and to object to the decision.

Further rules are set out in Article 22 of the Regulation.

12. Restrictions

EU or Member State law applicable to a controller or processor may limit the scope of rights and obligations (Articles 12 to 22, 34, 5 of the Regulation) by legislative measures, provided that the limitation respects the essential content of fundamental rights and freedoms.

The conditions for this restriction are set out in Article 23 of the Regulation.

13. Informing the data subject about the personal data breach

13.1. If the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller must inform the data subject of the personal data breach without undue delay. This information shall clearly and plainly describe the nature of the personal data breach and shall include at least the following:

- (a) the name and contact details of the Data Protection Officer or other contact person who can provide further information;
- c) describe the likely consequences of the data breach;
- d) describe the measures taken or envisaged by the controller to remedy the personal data breach, including, where appropriate, measures to mitigate any adverse consequences of the personal data breach.

13.2. The data subject need not be informed if any of the following conditions are met:

- a) the data controller has implemented appropriate technical and organisational protection measures and these measures have been applied to the data affected by the personal data breach, in particular measures, such as the use of encryption, which render the data unintelligible to persons not authorised to access the personal data;
- b) the controller has taken additional measures following the personal data breach to ensure that the high risk to the rights and freedoms of the data subject is no longer likely to materialise;
- c) information would require a disproportionate effort. In such cases, the data subjects should be informed by means of publicly disclosed information or by a similar measure which ensures that the data subjects are informed in an equally effective manner.

Further rules are set out in Article 34 of the Regulation.

14. Right to lodge a complaint with the controller

14.1. If the data subject considers that the processing of personal data concerning him or her infringes the General Data Protection Regulation, he or she has the right to lodge a complaint with the controller.

14.2. The controller recommends that the data subject contact the controller directly and exercise the following data subject rights before lodging a complaint with the authority in order to deal with the matter more quickly and efficiently.

As a general rule, any data subject can make a request to the relevant controller:

- **access** to your personal data,
- **rectification of** your personal data,
- **erasure of** your personal data,
- **the restriction of** that processing,
- **the portability of** your personal data,
- **may also object** to the processing of their personal data.

14.3. Whatever the request for the exercise of a data subject's right, the controller must inform the data subject of the action taken on the request without undue delay and in any event within one month of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. However, the controller shall inform the data subject of the extension of the time-limit within one month of receipt of the request, stating the reasons for the delay.

Contact details of the Data Protection Officer:

Dr. Ferenc József Tanács, lawyer

Address: 6726 Szeged, BÉRKERT UTCA 64/B., www.dratanacs.hu E-

mail address: dpo@dratanacs.hu

Contact details of the controller:

MEROVA Health Zártkörűen Működő Részvénytársaság

Registered office: 1095 Budapest, Dandár utca 9-11. B. lház. Fsz.

Door 5 Phone +36 30 524 3657

E-mail address: office@merovahealth.com

15. The right to lodge a complaint with a supervisory authority (right to official redress)

The data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, if the data subject considers that the processing of personal data relating to him or her infringes the Regulation. The supervisory authority with which the complaint has been lodged must inform the data subject of the procedural developments and the outcome of the complaint, including the right of the data subject to judicial remedy.

These rules are set out in Article 77 of the Regulation.

Contact details of the supervisory authority:

National Authority for Data Protection and Freedom of

Information Headquarters: 1055 Budapest, Falk Miksa utca

9-11 Postal address: 1363 Budapest, Pf.: 9.

Phone number: +36 (1) 391-1400

Central e-mail address: ugvfelszolgalat@naih.hu

16. Right to an effective judicial remedy against the supervisory authority

16.1. Without prejudice to any other administrative or non-judicial remedy, any natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning him or her.

16.2. Without prejudice to any other administrative or non-judicial remedy, any data subject shall have the right to an effective judicial remedy if the competent supervisory authority does not deal with the complaint or does not inform the data subject within three months of the procedural developments concerning the complaint lodged or of the outcome of the complaint.

16.3. Proceedings against the supervisory authority shall be brought before the courts of the Member State in which the supervisory authority is established.

16.4. If proceedings are brought against a decision of a supervisory authority on which the Board has previously issued an opinion or taken a decision under the consistency mechanism, the supervisory authority is obliged to transmit this opinion or decision to the court.

These rules are set out in Article 78 of the Regulation.

16.5. The data subject may exercise his or her right of judicial remedy before the competent court in the place where he or she resides or is domiciled (for the contact details of the courts, please visit <http://birosag.hu/torvenyszekek>).

17. The right to an effective judicial remedy against the controller or processor

17.1. Without prejudice to the administrative or non-judicial remedies available, including the right to lodge a complaint with a supervisory authority, every data subject shall have an effective judicial remedy if he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data not in accordance with this Regulation.

17.2. Proceedings against the controller or processor shall be brought before the courts of the Member State in which the controller or processor is established. Such proceedings may also be brought before the courts of the Member State in which the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in its exercise of official authority.

These rules are set out in Article 79 of the Regulation.

XI. ADDITIONAL PROVISIONS OF CHAPTER 1

Links to other websites

The website contains links to external websites. The Data Controller does not assume any guarantee or responsibility with regard to the content and information provided by third parties, their completeness or accuracy, the content of these third parties' websites and the products and services that may be provided through these third parties' websites, or the processing of users/visitors' personal data by these third parties. This Privacy Notice applies only to the website of the Data Controller and to the processing indicated.

Changes to the Privacy Notice and how to contact us

We may update this Notice at any time if it needs to be clarified or supplemented for any reason. Additions and amendments will take effect immediately upon publication of the updated prospectus. The publication will take place on our website and will be notified to the parties concerned by e-mail.

Done at Budapest, 5 October 2023.

MEROVA Health Zártkörűen Működő Részvénytársaság
Represented by: Kornélia Menyhárt, Chairman of the Board