

PRIVACY POLICY

Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter referred to as "**RODO**") impose an information obligation on us with respect to persons whose personal data we process. This notice considers the main aspects related to the processing of personal data of users of the www.juz-nie-boli.pl website (also referred to as the "**Website**") and of persons who use the services provided by the Administrator and persons who cooperate with the Administrator in other matters.

I. General information, contact details

1. The Administrator of personal data in accordance with the RODO is: **KUPALOV DM3D WORKSHOP SPÓŁKA JAWNA** with registered office in Poznań, Juliusza Słowackiego 25/15, 60 - 822 Poznań, REGON: 540986193, NIP: 7812085007, KRS: 0001157622 (hereinafter also referred to as "**Administrator**").
2. In case of any questions related to the processing of your personal data, you may at any time contact the Administrator at the mailing address indicated in paragraph 1 above, e-mail dm3d.workshop@gmail.com, or phone number: +48 571 395 359
3. The Administrator is registered in the Register of Entities Performing Medical Activities conducted by the Governor of Wielkopolskie Province.
4. The Treatment Entity performs therapeutic activity through an establishment of the Treatment Entity - **STOMATOLOGIA RODZINNA JUŻ NIE BOLI**, ul. Słoneczna 10A, 60-286 Poznań, REGON of the Treatment Entity: 54098619300019.

II. The most important rules

1. The Administrator is committed to ensuring that your personal information remains confidential and secure.
2. The Administrator processes your personal data only to the extent that is necessary for the operation of the Website, the provision of electronic services, the performance of health services, as well as the performance of other activities described herein.
3. The Administrator processes your personal data in accordance with applicable laws, including the RODO.

4. Providing personal data in most cases is voluntary. However, failure to provide certain personal data indicated in the Privacy Policy will entail the inability to use the healthcare services offered by the Administrator or other services provided by the Administrator.

III. What is personal data and what constitutes its processing?

1. Under the provisions of the RODO, "personal data" means any information about an identified or identifiable natural person.
2. An identifiable natural person is a person whose identity can be directly or indirectly determined, in particular on the basis of an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.
3. Within the general concept of personal data, the RODO distinguishes so-called "**special categories of data**." According to the wording of the Regulation, special categories of data include personal data revealing: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data processed for the purpose of uniquely identifying a natural person, as well as **data concerning a natural person's health**, sexuality or sexual orientation.
4. Among your personal data that the Administrator processes may be special categories of data, in the form of health data.
5. The processing of personal data should be understood as any action on personal data, performed in an automated or non-automated manner, such as collecting, recording, organizing, structuring, storing, adapting or modifying, downloading, viewing, using, disclosing by transmission, dissemination or otherwise making available, matching or linking, limiting, deleting or destroying.

IV. Purposes of personal data processing – general information

1. The Administrator collects and processes personal data in particular in connection with:
 - 1) providing outpatient inpatient health services,
 - 2) performance of activities preceding the provision of inpatient health services,
 - 3) providing services electronically, including for the purpose of enabling registration for a telemedicine consultation,
 - 4) undertaking marketing activities,
 - 5) archiving documents containing personal data, including maintaining and storing medical records,

- 6) maintaining social media profiles and accounts.
2. Your personal data may also be processed for other purposes, in which case you will be informed by the Administrator about this in each case, in a manner consistent with the information obligation under the RODO (Articles 13 and 14 of the RODO).
3. The scope of personal data processed by the Administrator includes (depending on the purpose for which the data is processed):
 - 1) identification data: first name, last name, PESEL, date of birth, age, device IP number,
 - 2) contact data: address of residence, mailing address, e-mail address, telephone number,
 - 3) data necessary for arranging medical services: description of health problem, information contained in medical records,
 - 4) data processed for the purpose of providing health services to the beneficiaries: data on the state of health, including test results, diagnoses made, treatment methods used, medications used and medical devices used,
 - 5) data necessary for billing: bank account number, address for billing purposes,
 - 6) data necessary for business cooperation: **data** of persons involved in providing services to the Administrator, personal data obtained in connection with business cooperation.
4. With regard to some of your personal data (listed below), due to the possibility of your asserting claims against the Administrator for services provided, the Administrator will process your data until the expiration of the statute of limitations for potential claims.
5. Currently, the statute of limitations is governed by the Civil Code. The general statute of limitations for claims by individuals in non-business matters is 6 years. However, the provisions of the Civil Code contain specific regulations providing for a longer limitation period for claims in cases of, among other things, tort damages, damages resulting from a crime or misdemeanor, and personal injury. In addition, based on the provisions of the Civil Code, the statute of limitations may be interrupted or subject to suspension. In view of the above, the Administrator will monitor each time whether the statute of limitations for claims related to the services provided has expired and, therefore, whether the period for storing your personal data has already expired.
6. The specific purposes of personal data processing, together with the legal basis and the processing period, are set forth in the table below:

1) Data processed for the purpose of performing health services:

No.	Purpose of data processing	Legal basis	Processing period
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1.	Patient registration, in order to start providing services	Article 6(1)(b) of the RODO, Article 9(2)(h) of the RODO in connection with Article 3(1) of the Law on Medical Activity and Article 24 of the Law on Patient's Rights and Patient's Ombudsman and the Regulation of the Minister of Health on types, scope and models of medical records and the manner of their processing	The period of storage of medical records resulting from the provisions of applicable law
2.	Enabling the Patient to register for a medical consultation under telemedicine	Article 6(1)(b) of the RODO, Article 9(2)(h) of the RODO in connection with Article 3(1) of the Act on Medical Activity and Article 24 of the Act on Patient's Rights and Spokesman for Patient's Rights and the Ordinance of the Minister of Health of April 6, 2020 on types, scope and specimens of medical records and the manner of their processing	The period of storage of medical records resulting from the provisions of applicable law
3.	Provision of health services, including maintenance of medical records, making medical diagnoses	Article 6(1)(b) of the RODO, Article 9(2)(h) of the RODO in connection with Article 3(1) of the Law on Medical Activity and Article 24 of the Law on Patient's Rights and Patient's Ombudsman and the Regulation of the Minister of Health on types, scope and models of medical records and the manner of their processing	The period of storage of medical records resulting from the provisions of applicable law
4.	Contacting the Patient for the purpose of enabling a medical teleconsultation,	Article 6(1)(b) of the RODO, Article 9(2)(h) of the RODO in connection with Article	The period of storage of medical records resulting from the provisions of applicable law

	confirming a consultation date, cancelling a consultation date, performing a consultation	3(1) of the Act on Medical Activity and Article 24 of the Act on Patients' Rights and Patients' Ombudsman), realization of the Administrator's legitimate interest in performing patient services (Article 6(1)(f) of the RODO	
5.	Identification of patient's identity prior to providing health services	Article 6(1)(b) and (c) of the RODO, Article 9(2)(h) of the RODO in connection with Article 3(1) of the Law on Medical Activity and Article 24 of the Law on Patient's Rights and Patient's Ombudsman	The period of retention of medical records resulting from the provisions of the applicable law, whereby if identification is made solely on the basis of identity documents presented for inspection, the data are processed only until the end of the consultation
6.	Administration of social security services, including the issuance of certificates or sick leave	Article 6(1)(b) and (c) of the RODO, Article 9(2)(h) of the RODO in connection with Article 3(1) of the Law on Medical Activity and Article 24 of the Law on Patient's Rights and Spokesman for Patient's Rights, Article 54 of the Law on Monetary Benefits from Social Insurance in Case of Sickness and Maternity	The period of storage of medical records resulting from the provisions of applicable law
7.	Conducting preventive health care activities	Article 6(1)(b) of the RODO, Article 9(2)(h) of the RODO in connection with Article 3(2) of the Medical Activities Act and Article 24 of the Patient's Rights and Patient Ombudsman Act.	The period of storage of medical records resulting from the provisions of applicable law

8.	Exercise of patient's rights, including the right of access to medical records and designation of an authorized person to provide access to medical records or information about the patient's condition	Article 6(1)(c) of the RODO in conjunction with Article 9(h) of the RODO and Article 26(1) of the Act on Patients' Rights and the Ombudsman for Patients' Rights and § 8(1) of the Regulation of the Minister of Health on types, scope and models of medical records and the manner of their processing	The period of storage of medical records resulting from the provisions of applicable law
9.	Performing settlements with patients, issuing billing documents, fulfilling obligations imposed by law, including tax law and accounting obligations	Article 6(1)(b) RODO	Until the statute of limitations for claims arising or which may arise from the services performed
10.	Accepting complaints regarding the health services provided	Article 6(1)(b) and (f) RODO (for ordinary data – data will be processed within the framework of the Administrator's legitimate interest in serving patients) and Article 9(2)(h) RODO (for special categories of data)	Until the statute of limitations for claims arising or which may arise from the services provided
11.	Contact via the contact form on the Service	Consent resulting from the initiation of contact (Art. 6(1)(a) RODO), as well as the Administrator's legitimate interest in being able to establish cooperation, to serve the interests of the interested parties and to conduct business (Art. 6(1)(f) RODO)	For the duration of the correspondence and, after its termination, for the period of the Administrator's legitimate interest, but no longer than until the statute of limitations for any claims related to the correspondence has expired

2) Data processed in connection with the conclusion by the Administrator of agreements concerning cooperation in the course of its business activities

(processing of data of contractors, business partners, suppliers, service providers):

No.	Purpose of data processing	Legal basis	Processing period
1.	Conclusion and execution of contracts with service providers, suppliers, doctors providing health services and other persons cooperating with the Administrator in the course of its business activities	Article 6(1)(b) RODO	Until the statute of limitations for claims arising or which may arise from the cooperation
2.	Conclusion and execution by the Administrator of a contract with an entity on behalf of which a representative – board member, employee, attorney – acts	Fulfillment of the Administrator's legitimate interest in being able to contact representatives of the other party to the agreement (Article 6(1)(b) and (f) RODO)	Duration of the contract
3.	Execution of settlements with cooperating entities	Art. 6(1)(b) RODO	Until the statute of limitations for claims arising or that may arise from the cooperation
4.	Maintenance of accounting and tax records, if personal data was provided in a contract or other documents related to the Administrator's performance of obligations under the law, in particular tax and accounting regulations	Article 6(1)(b) and (c) of the RODO in connection with the provisions of the Accounting Act, tax laws	For the period of storage of tax and accounting records resulting from the applicable legal regulations

3) Data processed for the purpose of marketing activities

Lp.	Purpose of data processing	Legal basis	Processing period
1.	Conducting marketing activities related to the Administrator's business, including establishing business relationships - within the framework of the Administrator's legitimate interest or consent expressed by the data subject	The Administrator's legitimate interest in marketing products and services (Article 6(1)(f) RODO)	For the duration of the Administrator's legitimate interest, but no longer than until: 1) filing an objection to the processing of data for the above purpose, 2) withdrawal of consent to the processing of personal data for the purpose of receiving ordered commercial information, if consent was previously given
2.	Analyzing data automatically collected through the Website, including the creation of preference profiles aimed at tailoring the targeted offer to customers' needs, while profiling does not affect the legal situation of data subjects or use special categories of personal data obtained for the purpose of providing health services.	The Administrator's legitimate interest in marketing products and services, ensuring the proper functioning of the Website and keeping statistics on its display (Article 6(1)(f) RODO)	For the duration of the Administrator's legitimate interest, but no longer than until you object to the processing of your data for the above purposes

4) Personal data processed for other purposes:

No.	Purpose of data processing	Legal basis	Period of processing
1.	Maintenance of accounting and tax records, if personal data was provided in the	Article 6(1)(b) and (c) of the RODO in connection with the provisions of the	For the period of storage of tax and accounting records resulting from the

	contract or other documents related to the Administrator's performance of obligations under the law, in particular tax and accounting laws	Accounting Act, tax laws	applicable legal regulations
2.	Archiving of documents produced by the Administrator in the course of its operations	Article 6(1)(c) of the RODO, Article 9(2)(h) of the RODO in connection with Article 3(1) of the Law on Medical Activity and Article 24 of the Law on Patient Rights and Patient Ombudsman, the Law on the Profession of Physician and Dentist. In addition, the basis for processing is the Administrator's legitimate interest in securing evidence for the purpose of proving facts (Article 6(1)(f) of the DPA)	For the period of document retention resulting from applicable laws and regulations and for the period of the Administrator's legitimate interest
3.	Establishing or asserting claims, defending against claims or allegations	The Administrator's legitimate interest in establishing or asserting claims and defending against claims or allegations (Article 6(1)(f) of the DPA)	Until the statute of limitations for claims in accordance with applicable law
4.	Creation of registers of processing activities and records required under the provisions of the RODO	Article 6(1)(c) RODO in conjunction with Article 30(1) and (2) RODO (the Administrator's legal obligation under the RODO regulations)	For the duration of the Administrator's operations

7. The Administrator uses Google Analytics (web analytics tools from Google Inc.) as part of the Website. Accordingly, the following rules apply:

- 1)** Google Analytics uses methods to analyze your use of the Website - for example, cookies. Details of the service are available at the following link:
<https://analytics.google.com/analytics/web/provision/?hl=pl#/provision>

- 2) As part of the analysis, personal data concerning the IP No. of the device from which you use the Website and data on activity on the Website are processed. However, the personal data processed in this way is not saved or archived anywhere.
- 3) According to Google's assurances, with respect to users Google in the European Economic Area and Switzerland is Google Ireland Limited with its registered office in Dublin, Ireland (Gordon House Barrow Street Dublin 4 Ireland).
- 4) Automatically collected information regarding the use of the Site may be transferred to a Google server and stored there. Google ensures that it uses the data protection mechanisms provided by European regulations. Details are available at the following link: <https://policies.google.com/privacy?hl=pl>
- 5) You can prevent Google from recording the data collected by cookies about your use of the Website (including your IP address), as well as the processing of this data, if you download and install the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=pl>.

V. From what sources do we obtain personal data?

1. The Administrator obtains personal data from various sources, depending on the data subject and the purpose of processing:

1) patient and customer data

Data are obtained directly from patients and clients, their legal representatives or legal guardians, as well as from other authorized persons, on the basis of a completed form, and in the course of providing health services;

2) data of recipients of marketing activities

Data is provided directly from you, from the entity on whose behalf you are acting, or from publicly available sources. When the Administrator obtains your data from other entities or from publicly available sources, the data includes: name, company name, address, position or function, e-mail address, telephone number.

3) data obtained from public records

In connection with its business activities, the Administrator may obtain data from public registers, such as CRBR, KRS, CEIDG, REGON, as well as from other sources as necessary. The scope of data obtained may include: first name, last name, PESEL, NIP, REGON, name of the business conducted, address data, telephone number, e-mail address, data on business registration, data on representative persons.

VI. Recipients of personal data

1. The Administrator carefully selects the entities with which it cooperates or whose services it uses to process personal data, striving to ensure the maximum protection of personal data belonging to you.
2. The Administrator does not share your personal data with third parties, unless it is necessary to ensure the proper processing of your personal data and the realization of the object of the activity. Data is or may be shared with or entrusted to the following entities:
 - 1) recipients of personal data:
 - a) other medical entities, in order to ensure continuity of treatment and ensure availability of health services,
 - b) entities providing postal and courier services,
 - c) banks (for the purpose of making monetary settlements),
 - d) Internet payment providers,
 - e) entities to which the Administrator is obliged to provide personal data under generally applicable laws, including persons authorized by you in the exercise of patient rights;
 - 2) to processors (on the basis of concluded contracts for entrustment of personal data processing):
 - a) Entities that may gain access to your personal data when providing hosting services to the Administrator, providing e-mail and other electronic means of communication, operating the databases and information systems used by the Administrator,
 - b) entities providing accounting services,
 - c) Google - due to the use of Google tools on the Website,
 - d) persons providing legal services to the Administrator.
3. The Administrator may transfer your personal data to third countries only in the case of the use of IT systems provided by entities based outside the European Union and the European Economic Area, or when it results from generally applicable EU or national laws. The Administrator shall ensure that the data will be transferred only to countries for which the European Commission has issued decisions on their compliance with an adequate level of personal data protection or with all legal requirements, including on the basis of an appropriate agreement that includes data protection clauses adopted by the European Commission, ensuring adequate security of the transferred data.

VII. The right to object to the processing of personal data

To the extent that the Administrator processes your personal data based on its legitimate interest (Article 6(1)(f) of the RODO), you may object to such processing at any time. The objection may be lodged in any form, including to the contact details indicated in I.2 or I.3 above.

VIII. Other rights in connection with the processing of your personal data

1. The RODO grants you the following rights in connection with the processing of your personal data:
 - 1) The right to request access to your personal data,
 - 2) The right to request rectification of your personal data,
 - 3) The right to request erasure of your personal data (right to be forgotten)
 - 4) The right to request restriction of processing,
 - 5) the right to data portability.
2. If the processing is carried out on the basis of consent, you may withdraw the consent you have given at any time, without giving any reason, in any form, in particular by sending us an e-mail to the data indicated in I.2 or I.3 above. Withdrawal of consent does not affect the legality of the processing that was carried out on the basis of consent before its withdrawal.
3. You have the right to lodge a complaint with the President of the Office for Personal Data Protection if you consider that the Administrator's processing of your data violates the provisions of applicable law.
4. Not all of the rights referred to in paragraph 1 will be available to you in respect of every case of processing. It depends on the type of processing and its legal basis.
5. The Administrator may make decisions by automated means, including the use of profiling, but this will not have any legal effect on you or similarly significantly affect you.

IX. Final provisions

1. When using the healthcare services offered by the Administrator, using the Website, as well as cooperating or communicating with the Administrator in any matter, you are obliged to respect the law and good morals, as well as to respect personal data, copyrights and personal rights of third parties.
2. The scope of the Administrator's activities may change and develop, and with this development the Privacy Policy will also change. We will inform the Administrator about the scope and content of these changes on the Website and perform, to the extent appropriate, the disclosure obligation.

COOKIE POLICY

X. What are cookies?

1. Cookies should be understood as IT data, in particular text files, stored on the users' terminal equipment intended for the use of websites. These files allow to recognize the user's device and appropriately display the website tailored to his individual preferences. Cookies usually contain the name of the website they come from, the time they are stored on the end device and a unique number.
2. In principle, cookies do not identify individuals, but only identify the computer and browser. However, due to the care with which the Administrator takes to protect personal data, it applies the protection measures provided for personal data to these files. Storing cookies in the browser's memory has no negative impact on your software or hardware. The cookie allows the information contained in it to be read only by the server from which it originated.
3. The Administrator makes every effort to ensure that the use of cookies on the Website is safe for your device. The use of cookies does not imply the collection of confidential information from you. Simply storing or accessing cookies does not result in configuration changes on your device.
4. When you visit the Website for the first time using a particular device, information on the use of cookies is displayed, along with a request to agree to their use.

XI. What are cookies used for?

Cookies are used to adapt the content of the Website to your preferences and to optimize the use of the Website, including:

- 1) recognizing users' devices and displaying them appropriately on the Website;
- 2) adapting and optimizing the Website to users' needs, remembering your preferences regarding the Website (language, color, layout, distribution of content);
- 3) creation of anonymous, aggregated statistics that help to understand how the user uses the Website which allows to improve its structure and content, excluding personal identification of the user;
- 4) ensuring the safety and reliability of operation from the Website.

XII. What cookies are used on the Website and how long are they stored?

The following types of cookies are used on the Website:

- 1) session cookies – these are temporary information stored in the memory of your browser until the session ends, i.e. you close your browser. These cookies therefore operate during your visit to the Website, after which they are automatically deleted. They are necessary for the proper functioning of certain functionalities on the Website;
- 2) permanent cookies – after visiting the Website, they will remain on your device along with memorized information, e.g. about your configured computer set-up, and will restore the settings on your next visit, making it easier for you to use the Website;
- 3) Third-party cookies – are information posted by the scripts of other websites. The Website uses Google Analytics scripts for web analytics, for statistical purposes. The cookies used by Google are anonymous. A description of how Google uses cookies is available at <https://policies.google.com/technologies/cookies?hl=pl>.

XIII. Deleting cookies

1. By default, your web browsing software allows cookies to be placed on your terminal device. These settings can be changed so as to block the automatic handling of cookies in the settings of your web browser or inform you each time they are sent to your device. Detailed information about the possibility and methods of handling cookies is available in the settings of your software (web browser).
2. Restricting the use of cookies, may affect some of the functionality available on the Website.

XIV. How to change browser settings to manage cookies or block them completely?

Sample information for selected browsers:

Firefox: <http://support.mozilla.org/pl/kb/ciasteczka>

Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>

Microsoft Edge: <https://support.microsoft.com/pl-pl/windows>

Safari: http://support.apple.com/kb/HT1677?viewlocale=pl_PL&

Opera: <https://help.opera.com/pl/latest/security-and-privacy/>