



Our Data Protection Promise

Affidea is committed to respect your rights under data protection laws. Keeping your personal and health data safe is very important to us. Our **Data Privacy Notice for Patients** ("Notice") contains the essential information about our data processing when providing your medical services. We kindly ask you to take a moment to read the Notice so that you are clear about why and how we process your personal data.

In the Notice you can find information on the following: (a) the identity and the contact details of the data controller; (b) the contact details of the data protection officer; (c) the purposes and legal basis for processing; (d) the sources of your personal data; (e) the recipients of your personal data; (f) the period for which your personal data will be stored; (g) your rights under data protection laws; (h) international data transfers.

Your Data Protection Statement

I. Mandatory acknowledgement for the provision of medical services to you (see section 1.1 of the Notice)

I, the undersigned, by signing this statement acknowledge that I have received the Affidea Data Privacy Notice and its Annex providing clarifications about how Affidea will process my personal data for the purpose of performing medical diagnosis and/or providing medical treatment.

II. Optional authorization(s) (see sections 1.2-1.3. of the Notice)

I, the undersigned, by ticking the boxes below voluntarily authorize Affidea to process my personal data for additional purposes. I understand that if I do not agree to the following, this will not have any impact on the medical services provided to me by Affidea. Tick here:

- I consent to my personal information being anonymised so that Affidea may use it and share it for research and development purposes
- I consent to the retention of my health record for 75 years following the medical service at Affidea
- I agree for my personal data to be used by Affidea to improve its services through data analysis
- I consent to be contacted for general marketing purposes via e-mail

I agree to participate in Affidea's satisfaction survey in relation to the medical service provided to me via

- personal
- e-mail
- phone

I Consent to contact me for personalized marketing purposes via

- e-mail
- SMS
- phone

Place and date: _____

Print full name of patient: _____

Signature of the patient: _____

If the patient cannot make a statement and/or sign on their own behalf, please provide us with the reason and the identity of the representative:

- child 16
- vulnerable adult
- other: _____

Print full name of the representative: _____

Signature of the representative: _____

Data Privacy Notice for Patients

Affidea is a medical services provider with high ethical standards. "Affidea" ("we" or "us" or "our") refers to Affidea Ireland legal entity collecting patient data, 156 Pembroke Road, Ballsbridge, Dublin. Contact Data Protection Officer Carol Tutty at carol.tutty@affidea.com / dpo.ie@affidea.com or by phone at 086 4665642.

Legal reasons for processing your personal data

We are committed to protecting and processing your personal data and we are required to do so by law. Our medical professionals are subject to a professional duty of confidentiality.

1.1. It is necessary for us to use your personal and health data so that we can provide you the requested medical service.

Processing of your basic personal data (e.g. name and contact details) is necessary for scheduling your appointment and for the delivery of the medical services you need. The **medical service agreement** constitutes the legal basis for processing your basic personal data.

Your health data covers information related to your health (e.g. information about a requested diagnosis/treatment and our health assessment). Providing you with a **medical diagnosis and/or medical treatment** forms our legal basis for processing your health data.

If you are in an extreme or life-threatening condition while present at one of our clinics, we will use your health data in order to preserve your health and well-being, and on the basis of **protecting your vital interests**.

1.2. We are constantly improving our services.

At Affidea we are always searching for better ways to provide our services.

If you do not mind being contacted after your visit for feedback about your experience, your participation in the satisfaction survey is optional and will not affect our service to you. If you do not object, we will also review your use of our services through analysis of the data we collected about you so that we can find new ways to provide a better service (for example looking at the location of patients to decide on whether to open a new medical centre). We do these for our **legitimate interest** of understanding what we can improve.

1.3. You can also voluntarily consent to the following additional beneficial processing activities of Affidea, if you wish.

By ticking the relevant box in the "your data protection statement" part you can voluntarily give us consent to the following with no extra cost.

A) Retention of your health record for 75 years

Your health information is extremely useful for you and, if you agree, we would like to retain it so that we can provide you with better long-term care. We know how difficult it is for you to find old medical reports and we also know how helpful your historical medical information is when we assess you and/or provide you with medical treatment. If you agree, we would like to retain your medical information for 75 years, which corresponds to the average life expectancy (compared to the statutory retention periods – see annex below) so that we can access your longer term personal electronic health record and clearly assess any future health condition.

B) Anonymising your data to improve medical services

We are committed to continuously improving our medical services. We kindly ask for your support by allowing us to anonymise a copy of your personal data and use it for research and development. Anonymization describes a process on personal data (or a set of personal data) that makes it permanently impossible to identify the person to whom the personal data related to. In this way, you remain anonymous.

In the field of research and development we intend to co-operate with other healthcare and information technology professionals and intend to share data (once it has been fully and irreversibly anonymised) with them. Your anonymised data will not be used for any other purpose and does not include personally identifiable information.

C) Contacting you for marketing purposes

We would like you to be aware of our general medical services and benefit from our tailored promotions and personalised medical services. If you agree to us contacting you with personalised marketing, you can also receive reminders if a repeat examination is due.

If you change your mind later, you can withdraw your consent(s) and this will not have any impact on the medical treatment you receive from us.

2. Data we process

During your relationship with Affidea, we obtain your personal data from three sources: (1) from you, (2) from others and (3) from our medical activity.

(1) In order to provide you with your medical service, we ask you to provide us your basic personal data (especially your personal identification data), your payment and insurance data (data necessary in order to pay for our service) and your health data (particularly information about your health condition). If you decide to share previous images and medical reports for us to use, we will store and process these on our systems for the purposes of your medical diagnosis and/or medical treatment. If you voluntarily supply contact information of your next of kin or family, this data will only be used when we are unable to contact you, or in the event of an emergency.

(2) We collect personal data from others in the following instances:

- a) If you are referred to our clinic by a medical provider (referring doctor or hospital) we consult this person about your health condition and/or treatment, if necessary to find the most appropriate medical service for you.
- b) If the medical diagnosis and/or medical treatment we provide you are paid for by a medical insurer (either public or private) we need to check your insurance cover before we provide the medical service to you.

(3) When providing your medical diagnosis and/or medical treatment, we are creating health data about you. As a medical services provider, Affidea is required by law to carefully document the service provided to you.

For further information about the data we process, please see the Annex of this notice or ask one of our receptionists.

3. How long we retain your data for

Affidea retains your personal data for a period necessary to provide medical services and to comply with applicable medical, tax, accounting or other legislative requirements. If our legal obligation to retain your data ends, we will delete your data or anonymise it (as explained above) unless you consent to us retaining your records for 75 years. Affidea will not delete your data if an alternative lawful basis for keeping it is identified, for example, Affidea's legitimate interest to defence against claims. If this is the case, we will contact you.

For further information about how long we keep your data, please see the Annex of this notice or ask one of our receptionists.

4. Who we share your data with

During your relationship with Affidea, we share your personal data with three different types of recipients: (1) with providers instructed by us, (2) with providers independent from us and (3) with people you request us to share data with.

(1) Affidea uses service providers (so-called data processors) to assist us in processing the personal information we receive and create (for example medical and financial software and hardware vendors, contracted medical professionals, providers of paper document storage). The data processors act on behalf of Affidea on our written instructions. We only share your data that is absolutely necessary.

(2) We share your personal data with third parties (meaning recipients independent from us) in the following instances:

- a) If we are required by law.
- b) If needed to perform our obligations with a medical professional or insurer you have a contract with.
- c) If the protection of your vital interest so requires, we will share your health data with other medical professionals.

We only share your data that is absolutely necessary.

(3) You may request that we send your health data to your referrer or your family doctor. If you wish to ask us to share your data with someone, we kindly suggest enquiring about how and why this person would process your personal data first. The processing activities of third party recipients are outside our control and responsibility. If you want us to share your health data with other medical professionals, please consult our receptionists about the available means for such data transmission.

For further information about the recipients of your personal data, please see the Annex of this notice or ask one of our receptionists.

5. International data transfers

It might be needed to share your personal data with recipients located outside Europe. Before transferring your data outside Europe, your data is safeguarded as we ensure (1) the recipient country is covered by an adequacy decision of the European Commission and (2) that so-called Binding Corporate Rules or standard EU contracts are used. If we need to transfer your data to a country not covered by an adequacy decision of the European Commission, we will inform you about this transfer in advance.

For further information about the location of your personal data, please see the Annex of this notice or ask one of our receptionists.

6. Keeping your data safe

Keeping your data safe is our priority. Your personal data is stored securely by us, or by our carefully selected service providers. When our service providers process health data on our behalf, we require a high level of protection.

We make sure that very strict security measures are in place to keep your personal data safe against loss and misuse, as well as unauthorized access or transfer.

7. Your rights

Under data protection legislation you have the following rights.

- 7.1. *Right to request access to your personal data.* This means that you are entitled to know that your data is being processed and you are entitled to access your personal data processed by us and to being provided with information about what Affidea does with your personal data.
- 7.2. *Right to request rectification of your personal data.* This means that you are entitled to have your personal data corrected or completed if it is inaccurate or incomplete.
- 7.3. *Right to request erasure of your personal data.* This means that you are entitled to have your personal data deleted in specific circumstances if there is no lawful reason for continuation of processing.
- 7.4. *Right to request from us restriction of processing.* This means that you may request to 'block' the processing of your personal data. Your valid request will mean that we will be allowed to store your personal data, but not to process it further.
- 7.5. *Right to data portability.* It allows you to access and reuse your personal data that you have provided us for your own purposes across different services. You are entitled to receive and transfer an electronic copy of your personal data easily and to ask us to transfer it to another controller.
- 7.6. *Right to object to the processing of your personal information for direct marketing purposes.*

If you wish to use your rights or wish to have further information about your rights above, please ask one of our receptionists or contact our Data Protection Officer (you can see the contact details below).

8. If you have any questions

If you have any questions or would like more information, please feel free to contact our Data Protection Officer (e-mail: carol.tutty@affidea.com / postal address: Affidea, Swift Square, Northwood, Santry, Dublin, telephone number: 086 4665642 or ask one of our receptionists for further information. If you are unhappy with the way we process your data, you can make a complaint to the Supervisory Authority www.dataprotection.ie. However, we would of course hope that you are able to raise any issues with us in the first instance.

Annex to Data Privacy Notice for diagnostic imaging

Below you can find further information about who we share your data with. We only share your data with other recipients if it is absolutely necessary.

Data recipients acting on behalf of (and instructed by) Affidea				
Industry	Sector of activity	Sub-Sector of activity	Type of activity	Identity / Location of the recipient
Medical	Medical Professionals	Doctors	Provision of medical services	in Ireland
	Medical Professionals	Other healthcare professionals	Provision of medical services	in Ireland
	Consultant Medical Professional	Radiologist	Provision of a second opinion, if necessary	in Ireland or within Affidea's group of companies, if necessary
Service Providers	Administration	Call Centre	Scheduling appointment by calling our call	DPO.IE@affidea.com
	Operation of medical equipment	Maintenance	Maintenance of Medical Equipment	Siemens
Marketing	Promotion	Newsletters	Sending newsletters, if you consented to our marketing activity	Affidea Ireland
	Customer Database management	Data Storage	Storing of customer contact information, if you consented to our marketing activity	Affidea Ireland
Information Technology	Electronic communication	E-mails	Operation and Hosting of E-mail system	Affidea
	Administration Software	Call Centre Software	Storing voice recordings of calls	Affidea Ireland
	Administration Software	Operation and Hosting of Patient Portal	Online booking	Aptvision
	Medical Software	Radiology Information System	Patient registration, scheduling, examination data creation and diagnosis creation, billing support, distribution of medical report	Aptvision
		Picture Archiving and Communication System	Storage of diagnostic images	Biotronics
	Financial Software Supplier	Accounting	Billing of health costs	Medserve
	Operation	Operation of IT infrastructure	Ensuring availability of data	Affidea Ireland / Budapest
	Support	User Support	Ensuring availability of systems	Affidea Ireland / Budapest
		System support	Software maintenance	Affidea Ireland / Budapest
Data Storage	Back-up of data	Securing availability of data	Affidea Ireland / Budapest	
Security	Monitoring premises	CCTV operation	Video recording	

Third party data recipients (acting independently from Affidea)				
Industry	Sector of activity	Sub-Sector of activity	Type of activity	Identity of the recipient
Health Insurer	Private Health Insurance	Financing	Confirmation of insurance coverage	VHI, Laya, Irish Life, GMA, ESB
		Financing	Confirmation of insurance coverage	As above
	National Health Insurance	Operation of National Health Database	Storage of NHI financed medical files	Aptvision and Biotronics
Financial institution	Bank	Payment	Payment processing by credit or debit card	AIB
	Private Health Fund	Payment	Reimbursement of health costs	
Medical	Public Medical Management	National Medical Organisation	Management of national quotas, if medical services is publicly financed	HSE
	Ambulance	-	Delivery of patients to or from our medical centre	HSE
	Referring Doctor / Medical organisation	-	Referral of patients	
	Clinical Research Organisation	Clinical research	Requests and uses clinical exam results, if you are participant of it	N/A
Public Authorities	Medical Authority, police, etc.	-	Exercise of investigating power	IMC
Insurance	Service Insurance	-	In case of a claim filed by you concerning our medical service	

Audit	External Audit Organisation	-	examination of quality standards	JCI MERU EPA
	Certified public accountant	-	examination of books of accounts	
Communication	Postal services	-	Delivery of letters	AN POST
	Telephone services	-	Operation and Hosting Telephone system	EIRCOM

Below you can also find further information about the type of data we process for the various purposes (as outlined in section 1.1-1.3. of the Notice) and about how long do we keep your data for.

Personal data processed				
Purpose of our data processing	Personal Data Type	Examples of Personal Data	Reasons for Processing	Retention period
Medical Service	Basic Personal Data	Name, NHI Number, Mobile number, Address, email address	Scheduling of appointment, registration, identification of patient, keeping contact with patient	8 YEARS
	Financial and Insurance Details	Proof of Insurance Cover, Credit Card data	Financing and payment	6 YEARS
	Medical Data	Prescription, Historical Medical Records, Diagnosis	Patient safety, confirmation of correct medical procedure, production of medical diagnosis and planning medical treatment	Adult: 8 years from last episode of care Children: 8 years from turning 21 and last episode of care
	Other personal data	Identity of referring/family doctor	contact other medical professional for further health care data for the best care	As above
Longer retention of your health record as per your consent	As detailed above			75 years, unless you withdraw your consent
Anonymisation of your data for improving medical services	Anonymised Medical Data	Diagnosis	Research and development	No identifiable personal data of yours is retained
General Marketing	Basic Personal Data	Name, Mobile number, Address, email address	Sending general promotional information to you	Until the retention period as detailed above
Tailored Marketing	Basic Personal Data	Name, Mobile number, Address, email address	Sending tailored promotional information to you	Until the retention period as detailed above
	Medical Data	Type and date of your diagnosis and/or medical treatment at Affidea		