# **Privacy Policy**

We are committed to protecting your privacy and ensuring that your personal data is handled in compliance with the General Data Protection Regulation (GDPR). This Privacy Policy explains how we collect, use, store, and protect your personal data, as well as the rights you have regarding your information.

## 1. Data Subject Rights

As a data subject, you have the following rights under Articles 12-23 of the GDPR:

Right to Access: You may request access to the personal data we hold about you, including information about how it is processed.

Right to Rectification: If your personal data is inaccurate or incomplete, you have the right to request corrections.

Right to Erasure ("Right to Be Forgotten"): You can request the deletion of your personal data. Once we receive your request, we will review it and delete your data within 30 days, unless legal or regulatory obligations require us to retain it.

Right to Restriction of Processing: You may request that we temporarily or permanently restrict the processing of your personal data under specific circumstances.

Right to Data Portability: You have the right to receive a copy of your personal data in a structured, commonly used, and machine-readable format, or request its transfer to another data controller.

Right to Object: You can object to the processing of your personal data for purposes such as direct marketing or where processing is based on legitimate interests.

Right to Withdraw Consent: If you have provided consent for data processing, you may withdraw it at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

Right to Lodge a Complaint: If you believe your rights under the GDPR have been violated, you have the right to file a complaint with the relevant supervisory authority.

To exercise any of these rights, please contact us at the details provided in Section 7.

## 2. Legal Basis for Processing

We rely on the following legal bases for processing your personal data, in accordance with Article 6(1) of the GDPR:

Consent: When you have given explicit and informed consent for specific purposes.

Contractual Necessity: When processing is necessary to deliver medical services or fulfill contractual obligations.

Legal Obligation: When processing is required to comply with applicable laws and regulations, such as record-keeping for healthcare services.

Legitimate Interests: When processing is necessary for our legitimate interests or those of third parties, provided these interests do not override your fundamental rights and freedoms.

Vital Interests: When processing is essential to protect your life or the life of another person.

### 3. Personal Data Collected

We collect the following categories of personal data for specific and explicit purposes:

#### **Identification Data:**

- Full name
- Date of birth

#### Contact Information:

- Email address
- Phone number
- Emergency contact details

#### Medical Data:

- Medical history
- Medical record number
- Relevant health information required for diagnosis, treatment, and care

### Appointment History:

Details of consultations, treatments, surgeries, and any follow-up appointments

## **Purpose of Collection:**

We collect this data to:

- Provide medical services and continuity of care.
- Manage appointment scheduling and communications.
- Ensure compliance with legal and regulatory requirements.
- Address patient inquiries, emergencies, or other medical needs.

We will only process your personal data for the purposes outlined above and will not use it for unrelated purposes without informing you and, where necessary, obtaining your consent.

# 4. Data Retention and Deletion Policy

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected or to comply with legal and regulatory obligations. Retention periods are determined by:

Legal Requirements: Medical record retention laws specific to your jurisdiction.

Operational Needs: Ensuring continuity of care and compliance with quality assurance standards.

### **Request for Data Deletion:**

If you request the deletion of your personal data, we will process your request and ensure that your data is erased within 30 days, unless legal obligations require us to retain certain information. For example:

- We may need to retain records to comply with healthcare regulations.
- In some cases, data may be anonymized instead of being deleted.

After the retention period expires or your request for deletion is fulfilled, we will securely delete or anonymize your data to prevent unauthorized access.

# **5. Security Measures**

We take the security of your personal data seriously and implement stringent measures to protect it against unauthorized access, loss, or misuse. These include:

Encryption: All sensitive data is encrypted during transmission and at rest.

Access Controls: Only authorized personnel have access to personal data, based on their roles and responsibilities.

Data Anonymization: Where possible, personal identifiers are removed to protect your privacy.

Regular Audits: We regularly review and update our systems to address emerging security threats.

Incident Response: In the event of a data breach, we will promptly notify affected individuals and regulatory authorities as required by GDPR.

## 6. Third-Party Sharing

We may share your personal data with third parties only in the following situations:

- Healthcare Providers: To coordinate care with specialists or external medical facilities.
- Regulatory Authorities: To comply with legal obligations, such as audits or public health reporting.
- Service Providers: To engage third-party vendors for data storage, IT support, or other essential services. All third-party providers are contractually obligated to handle your data securely and in compliance with GDPR.

We do not sell or rent your personal data to third parties for marketing purposes.

#### 7. Contact Information

If you have questions about this Privacy Policy, wish to exercise your data rights, or have concerns about your personal data, please contact us:

**SARM** 

sergio.cossiba@gmail.com

+351-953242345

We are committed to addressing your inquiries promptly and ensuring that your privacy rights are respected.

# 8. Updates to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in legal requirements, data processing practices, or organizational policies. Any updates will be communicated through appropriate channels, and the updated policy will be effective as of the date indicated.