

PATIENT CONFIDENTIALITY AGREEMENT

FirstMed-FMC Kft., Budapest (herein after The Clinic) adheres to and enforces a strict policy regarding patient confidentiality. The following policy sets forth the rules and regulations governing patient rights to medical confidentiality and information disclosure. Although many things are specified, common sense should prevail in all situations. Employees of The Clinic are expected to use their best judgment before discussing or disclosing information that may be confidential in nature.

An employee violating The Clinic's policy will be disciplined on a case-by-case basis with possibly, up to and including, unpaid suspension and termination of employment.

Medical Information

All medical information is confidential and cannot be disclosed, copied, given out or released in anyway to anyone without prior documented patient consent. Additionally, anything a patient says regarding their medical care to a member of the medical team or staff of The Clinic is confidential.

All personal and medical information of staff members and physicians of The Clinic are strictly confidential.

All the same rules apply to disclosing staff and physician information as apply to patients of The Clinic.

In addition, the following information, though not medical information is considered confidential:

1. Patient personal information.
2. Patient Demographics. For example, address, phone numbers, email, or date of birth.
3. Individual's status as a patient of The Clinic; whether the individual is or is not a patient of The Clinic.
4. Patient's status in The Clinic; whether the patient has an appointment, or has left The Clinic.
5. Patient's financial status and financial records with The Clinic.

When a patient is in The Clinic, there is a responsibility to protect him or her from disclosing information in a public area that would routinely be part of his or her care. The following procedures will be utilized to protect patient identity and confidentiality in public areas of The Clinic:

1. All patients must be called by first name only so as not to identify the patient too specifically where others may hear; this includes telephone conversations.
2. All information given in public areas must be limited so as not to connect a specific diagnosis or problem with a specific patient. If a patient requests information that could link the patient to a specific diagnosis, it should be given in a private area.
3. All patient charts must be closed on the workstations as soon as the employee has finished with it OR leaves the area.
4. Encounter forms, patient notes and charts or anything else containing a patient name or information should not be left where they may be in view of others.
5. Any paper or document containing a patient's name cannot be reused and must be shredded, including encounter forms, invoices, or patient letters. Please be aware that some of these documents must be legally stored for a set number of years before shredding.
6. Any document needing to be faxed should be marked as confidential and should be handled appropriately immediately after faxing to keep out of sight of others.

Disclosure:

As routine part of medical care, records and other types of confidential information must be released. The following terms apply to information distribution and to whom:

1. In the case of a legal adult (age 18 and older), medical results or information may be given only to the patient it is concerning unless otherwise documented. Information cannot be given to a patient's family member or anyone else unless it is documented prior to the occurrence.
2. In the case of a minor (anyone under the age of 18), medical information regarding reproduction, sexual activity, and substance abuse is confidential. All other medical information can be disclosed to an immediate family member upon request.
 - a. Immediate family is described as one's family of creation in the case of a legal adult and family of origin in the case of a minor.
 - b. Acceptable documentation is defined as a statement from the patient, written into the chart, detailing where and to whom information can be disclosed.
3. Patient medical information can be disclosed in the event of a public health concern and then only to the appropriate authorities according to the appropriate laws of the country.
4. If the medical staff believes the patient or someone else is in danger as a result of a disease the patient has or something the patient has said, there is then an obligation on the part of the medical staff to report this information to the appropriate authorities or people. For instance, notifying a parent of a suicidal teenager.
5. Information over the phone should be given in privacy or without the use of the patient's name.
6. Medical information may not be left on an answering machine or left in message form with an individual other than the patient.
7. Any other type of disclosure cannot occur unless there is documented patient consent to distribute medical information. At such time, the documentation should be specific as to where the information can go and to whom.

The Clinic Staff Obligations:

1. Employees of The Clinic should not access or be involved in obtaining any information not directly related to their job. Information necessary to do an individual's job is strictly confidential.
2. An employee should only pass on information needed to do their job.
3. Any information accidentally disclosed, attained or revealed by a staff member of The Clinic is strictly confidential.
4. It is the responsibility of staff members to uphold their patient confidentiality obligations. This may include reminding other staff members of such.

Financial Information:

1. All financial information of The Clinic is confidential. Prices can be given out upon request, but should be given in general terms as the price of a patient visit is only determined by the course of treatment.
2. All patient financial information is confidential and cannot be disclosed, copied, given out or released in anyway to anyone without prior documented patient consent.
3. The Clinic's financial information should only be seen and discussed by appropriate staff and personnel.

Further addendum to this policy will be made as needed. Employees will be notified via written memos with the effective date clearly marked and requiring the employee's signature.