

Foundation “Sanatorium “Belarus (Belorusija)”” in Jurmala PRIVACY POLICY

The purpose of the privacy policy of the Foundation “Sanatorium “Belarus (Belorusija)”” in Jurmala is to provide you (the data subject) with information about the legal and factual circumstances of your personal data processing, namely information about the purpose, scope, protection of personal data processing, as well as other information about your personal data. Please read the Policy carefully and if you have any additional questions, please contact us using the contact information provided in this Policy.

We draw your attention to the fact that the Policy may be amended, supplemented, updated, of which we will inform you by posting this information on our Website.

We respect your privacy, so the security of your personal information is our priority. We use appropriate organizational and technical means to ensure the continued security of your personal data and the compliance of data processing with the requirements of data protection laws and regulations, as well as our internal regulations.

We comply with the requirements of personal data protection legislation and take care in each data processing process to collect only the information necessary to achieve the objectives set out in this Policy.

I. Controller and its contact information

- 1.1. The controller of personal data processing is the Foundation “Sanatorium “Belarus (Belorusija)”” in Jurmala (hereinafter – Sanatorium), Bulduru avenue 4/8, Jurmala, LV-2010, tel. +371 66014100, e-mail: rezervacija@belorusija.lv.
- 1.2. The data protection specialist of the Sanatorium is Jānis Kāršenieks, e-mail: janis.karsenieks@belorusija.lv Please be informed that the mentioned e-mail address is not intended for news requests, exercising your rights as a data subject, in which case you should write to e-mail: reservation@belorusija.lv or to the address: Bulduru avenue 4/8, Jurmala, LV-2010.

II. Purposes of personal data processing

- 2.1. The purposes of personal data processing are:
 - 2.1.1. compliance with the requirements of regulatory enactments and personal identification (including, but not limited to):
 - ❖ Performing a record keeping function, including, but not limited to, receiving the application/ e-mail/ request, registering, sending the reply, etc.;
 - ❖ Processing of the received application/ e-mail/ request and preparation of the response;
 - ❖ Performing outpatient and inpatient medical rehabilitation consultations and services, dentistry, hotel services and administration, etc.;
 - 2.1.2. personnel management, including personnel selection conclusion and performance of an employment contract; working time accounting; ensuring the calculation of wages and the performance of wages; fulfillment of accounting requirements (execution of relevant justification documents, execution of business trip); provision of social benefits for employees (organization of health insurance, involvement of cooperation partners so that employees receive discounts); recording and control of the performance of work duties, etc.;
 - 2.1.3. for the provision and administration of outpatient and inpatient medical rehabilitation consultations and services, dental services:
 - ❖ Patient identification;
 - ❖ Registration of the patient with the specialists/doctors of the Sanatorium;

- ❖ Drawing up the patient's medical documentation in accordance with the requirements specified in regulatory enactments;
 - ❖ Reminders for patients about the planned visit to the Sanatorium specialists/doctors;
 - ❖ For medical examinations;
 - ❖ For medical consultations and medical manipulations;
 - ❖ To assess the health status of patients or other individuals;
 - ❖ Settlement administration;
 - ❖ Recovery of debts from debtors;
 - ❖ Review of patients' objections and quality control;
 - ❖ Promotion of patient loyalty, measurement of satisfaction;
 - ❖ Preparation, conclusion and execution of a contract with patients;
- 2.1.4. scientific and research work in the field of medicine and the introduction of new treatment methods and medical technologies;
- 2.1.5. training of residents;
- 2.1.6. for conducting clinical trials;
- 2.1.7. for the provision of information to public administration institutions and subjects of operational activities in the cases and to the extent specified in external regulatory enactments;
- 2.1.8. to ensure the safety and protection of property of patients, Sanatorium employees;
- 2.1.9. information for the input of the State Unified Medical Information System (E-Helath (E-veselība).
- 2.1.10. implementation of the legitimate interests of the Sanatorium and its clients: improvement of services, development of new services;
- 2.1.11. Ensuring the administrative operation of the Sanatorium, including ensuring security on the premises of the Sanatorium (for example, maintenance of access control systems); ensuring cooperation with partners, state and local government institutions, public organizations, incl. sk. transmission / receipt of information necessary for ensuring cooperation;
- 2.1.12. maintenance of Sanatorium's websites and improvement of operations.
- 2.1.13. For the purpose of booking a hotel (whether the process is provided by contacting a marketer or directly at the hotel), the Sanatorium processes your personal data in order to:
- ❖ Give you the opportunity to book a room in the hotel;
 - ❖ Check the availability of the hotel and administer the reservation;
 - ❖ Send you a booking confirmation and
 - ❖ Send you a non-commercial e-mail before your arrival at the hotel. You can opt out of receiving pre-arrival e-mails at any time by clicking the unsubscribe link in the e-mails you send.
- 2.1.14. When you stay at a hotel, we collect and process your personal information in order to
- ❖ Register your arrival and check-out at the hotel;
 - ❖ Obtain a credit card guarantee or deposit to secure payment for the hotel visit;
 - ❖ Manage (and archive) your hotel registration card;
 - ❖ Create or update your profile in the hotel management system;
 - ❖ Access your compliance with the change of number and, in applicable, organize it;
 - ❖ To make your visit as enjoyable as possible. For this purpose, we process your personal data in order to provide you with certain services during your stay (cleaning and maintenance of rooms; return of lost or forgotten belongings to the owner and/or providing you or your accompanying guests, such as food needs, extra pillows to provide you with better service during your stay);
 - ❖ To ensure payment processing related to your stay;
 - ❖ Draw up, print or send you and invoice for your stay.
- 2.1.15. If you have booked a room at the Sanatorium Hotel but do not arrive at the hotel on the agreed date – without first canceling the booking – we will process your data in order to
- ❖ Cancel your room reservation and other reservations, if any, and
 - ❖ Manage, process and collect outstanding payments that may be due.
- 2.2. The purposes of data processing referred to in point 2.1 of the Privacy Policy are indicative and personal data may also be processed for such purposes not directly mentioned, which are closely related to the above and necessary for the fulfillment of regulatory enactments.

III. Legal basis for personal data processing

- 3.1. The Sanatorium processes your personal data on the basis of the following legal bases:
- 3.1.1. for prophylactic purposes, medical diagnosis, treatment purposes (Article 9, second paragraph, point h) of the Regulation);
- 3.1.2. with the consent of the data subject (patient) (article 9, second paragraph, point a) of the Regulation, Section 10, Paragraph 2 of the patient's Rights Law);

- 3.1.3. for the fulfillment of regulatory enactments – in order to fulfill the obligations specified in external regulatory enactments binding on the Sanatorium or the data subject's rights specified in external regulatory enactments (Article 9, Paragraph two, point b) of the Regulation, Section 10 of the Patients' Rights Law);
- 3.1.4. in cases where the processing is necessary for the implementation or defense of the legitimate interests of the Sanatorium in court (Article 9, second paragraph, point f) of the Regulation;
- 3.1.5. in cases where the processing is necessary to ensure the legitimate interests of the Sanatorium (to organize an efficient process of provision of health care services, to ensure an efficient process of requesting and revoking patient visits, to receive payment for the provided health care services);
- 3.1.6. in cases where the processing is necessary for the performance of a contract with the data subject (patients) or for taking measures at the request of the data subject before the conclusion of the contract (Article 6, first paragraph, point b) of the Regulation);
- 3.1.7. in cases where the processing is necessary to protect the vital interests of the data subject (client, patient) or another individual (Article 6, first paragraph, point d) of the Regulation);
- 3.1.8. for archiving purposes in the public interest, for scientific or historical research purposes, or for statistical purposes (Article 6 1) e) and Article 9 2) j) of the Regulation).

IV. Amount of Personal data to be Processed

4.1. The categories of personal data processed by the Sanatorium depend on the services of the Sanatorium used by the individual:

- 4.1.1. When a data subject receives health insurance services, in accordance with the requirements of regulatory enactments, the Sanatorium is obligated to process the data subject's identifying information and information confirming the diagnosis, substantiate examinations and treatment methods, as well as accurately reflect treatment results. In this case, in order to implement the purpose of providing health care services, the Sanatorium may process the widest possible amount of data, which includes – name, surname, personal identification number, contact information, lifestyle, information about illnesses, information about received and receivable health care services (how often, what services are chosen etc.), the information that the relevant healthcare professional/doctor will choose to find out and record in the medical documentation in the specific situation.
- 4.1.2. When a data subject enters/arrives at the premises of the Sanatorium or its territory, where video surveillance is performed, his/her video image and the time when he/she has visited the premises may be processed. Video surveillance is not performed in areas where data subjects expect increased privacy, recreation areas, changing rooms, etc. CCTV recording areas are focused on corridors, entrances/exits, cars and the flow of people in the Sanatorium area.
- 4.1.4. When calling the telephone numbers specified by the Sanatorium, the content of the communication may be recorded, as well as the telephone number or the caller may be fixed.
- 4.1.5. When communicating in writing with the Sanatorium, the content and time of the communication may be saved, as well as information about the used communication tool (e-mail address, telephone number, etc., address, information specified in the e-registration system);
- 4.1.6. The Sanatorium analyzes the history of website visits using online identifiers, as well as information deliberately left by the data subject (e.g. assessment of the service provided, website visit experience, movement, information on the wish to apply for one of the services provided by the Sanatorium, etc.), to conduct market research and analysis of opinions.
- 4.1.7. In connection with the hotel reservation process – address, date of arrival and departure, e-mail address, name, name of the adult accompanying guest(s), type, number and period of validity of the payment card, phone number.
- 4.1.7. For check-in and hotel stays: address, date of arrival and departure, e-mail address, name, name of adult accompanying guest(s), type, number and period of validity of the payment card, phone number, habits, nutritional needs, other wishes.

4.2. As part of the provision of services, the Sanatorium may obtain additional information from the Data Subject and other third parties, which primarily includes, but is not limited to, referral information, information on previous treatment cases, information obtained within the specific treatment episode.

4.3. The specific amount of information depends on the specifics of the respective service to be provided and the applicable regulatory enactments that regulate the conditions for the provision of the service.

4.4. The Sanatorium is aware that in providing its services, it processes health data, which is considered to be a special category of personal data in the context of the Regulation.

V. Categories of recipients of personal data

5.1. Categories of recipients of personal data: data subject, Sanatorium and its authorized employees, state and local government institutions, in cases specified in court regulatory enactments.

5.2. We may only disclose your special category (health) data in cases specified in the Patients' Rights Act (e.g. relatives) or with your consent.

5.3. If the payment for the services you need is made from state funds, in compliance with the obligation specified by law, we transfer your personal data to the National Health Service in the specified amount for reporting.

5.4. In order to ensure the rights of the Sanatorium, the safety of employees, third parties and property, data may be also transferred to other competent authorities or law enforcement authorities, but only if necessary, in accordance with the Patients' Rights Law and other applicable laws and regulations, in cases and in order.

5.5. The data processors involved in the Sanatorium may process your personal data only in accordance with our instructions and may not use them for other purposes or transfer them to other persons without our consent. Such persons may include database software maintainers, database administration, service providers, data center maintenance and cloud computing service providers. In each case, we provide data processors only with the amount of data necessary to perform a specific task or provide specific services. In addition, they must ensure the protection of your data in accordance with the requirements of applicable laws and regulations and the written agreement concluded with us, which provides, among other things, for the permanent deletion of any of your data after the performance of our task or termination of cooperation.

VI. Transfer of personal data to a third country or international organization and automated decision making

6.1. The Sanatorium does not intend to send personal data to third countries or international organizations. In certain cases, if it is necessary to transfer your personal data outside the European Economic Area, we will do so when we have the right to do so and with an adequate level of protection.

6.2. Automated decision making is not performed in the Sanatorium.

VII. Rights of the Data subject

7.1. You have the right to receive our confirmation as to whether we process your personal data, as well as the right to inspect your personal data, which we process, information about the purposes of data processing, the category of data processed, the category of recipients, the data processing period, data sources, as well as their meaning and consequences.

7.1.1. We provide most of this information to you in this Policy.

7.1.2. If the information provided in this Policy is not sufficient for you, you can always contact us in accordance with the procedure specified in Section 1.3 of this Policy.

7.2. If the data at our disposal has changed or you see that the information we process about you is inaccurate or incorrect, you have the right to request that this information is changed, clarified or corrected.

7.3. In cases where we process your data on the basis of your consent, you have the right to withdraw your consent at any time, and the processing of data based on your consent will be stopped. Such processing shall not be interrupted if it is required by law or order of the competent authority or if the nature of the processing makes this impossible.

7.4. In any situation, we may keep your consent and proof of it for a longer period, if it is necessary to protect your rights in connection with claims against us.

7.5. If you believe that we process your data in violation of the requirements of personal data protection legislation, we invite you to contact us directly.

7.6. If you are not satisfied with our answer and justification or in your opinion we do not take the necessary actions, you have the right to submit a complaint to the supervisory authority, which is the Data State Inspectorate in the Republic of Latvia (www.dvi.gov.lv; Blaumaņa street 11/13-15, Riga, LV-1011).

7.7. You have the right to object to the processing of personal data if the personal data is processed on the basis of our legitimate interests.

7.8. If there are appropriate circumstances referred to in the personal data processing legislation, for example, if personal data is processed illegally, the legal basis for data processing is lost, you have the right to request that we delete your personal data. If you wish to exercise this right, please submit a written request to us.

7.9. In the event that the personal data we process is used for other purposes mentioned in this Policy and the legal basis for their processing is not consent, we may retain the relevant information to ensure that other purposes are achieved.

7.10. If there are relevant circumstances mentioned in the data processing legislation, for example, if personal data is processed illegally, you dispute the accuracy of the data, you file objections to data processing based on our legitimate interests, you have the right to restrict your data processing.

7.11. You have the right to request the portability of data that you have submitted to us in electronic form. Upon receipt of your request for data portability, we will ensure the exercise of your rights by issuing the data in a widely used and computer readable format or by sending your requested data in electronic form to the addressee of your choice, following the information provided in your request.

7.12. In an effort to protect the personal data of all our data subjects from unauthorized disclosure, we will need to verify your identity when we receive your request for data or exercise your other rights. For this purpose, we may ask you to present an identity document, as well as, if the request concerns your birth certificate, power of attorney or other proof of representation, unless the situation allows you to comply with your request without such verification. If you do not prove your identity and/or representation, we will reject your request.

7.13. Upon confirmation that you are entitled to comply with your request, we undertake to provide you with information on the progress of your request without delay, but no later than one month after the receipt of your request and the end of the verification procedure.

7.14. If your request has been submitted by electronic means, we will also provide you with an answer by electronic means, unless this is not possible, for example, due to the large amount of information or if you ask us to reply you in another way.

7.15. If we are forced to reject your request due to the circumstances specified in the regulatory enactments, we will inform you in writing about the refusal, duly substantiating it.

VIII. Security of Personal data

8.1. We use a variety of security technologies and procedures to protect your personal information from unauthorized access, use or disclosure. Personal data is available only to those persons who need it for the performance of their duties and only to the extent necessary. Confidentiality agreements have been concluded with all persons who have access to health and genetic data, and these persons have been informed about the rules of personal data protection and are regularly trained.

8.2. The service providers we choose are carefully selected, and we require them to use appropriate means to protect the confidentiality of your data and ensure the security of your personal information. However, if the information is transmitted over the internet or mobile communications, its security

cannot be fully guaranteed, so you must independently assess the risks associated with the confidentiality of the information and bear it in mind if you decide to provide us with any information in the ways specified above.

IX. Storage of Personal data

9.1. The Sanatorium shall store personal data in accordance with the nomenclature of Sanatorium cases for no longer than it is necessary to achieve the relevant purpose of personal data processing.

9.2. Sanatorium shall take into account the following:

9.2.1. whether the term of storage of personal data is determined or follows the regulatory enactments of the Republic of Latvia and the European Union;

9.2.2. for what period of time the relevant personal data must be stored in order to ensure the realization and protection of the legitimate interests of the Sanatorium or a third party;

9.2.3. until the consent of the person to the processing of personal data has been revoked and there is no other legal basis for the processing of the data, for example, in order to fulfill the obligations binding on the Sanatorium;

9.2.4. the Sanatorium needs to protect the vital interests of the Data subject or other individual, including life and health.

9.3. When providing health care services, the Sanatorium complies with special regulatory enactments that stipulate its obligation to retain certain data. If you want to know detailed information, please contact the Sanatorium using the contact information mentioned above;

9.4. Video surveillance records for the prevention or detection of criminal offenses relating to protection of persons and property, the protection of the legal interests of the Sanatorium or a third party and the protection of vital interests, including life and health, shall be kept for a period not exceeding 30 days unless no possible illegal action or action, that is likely to help the Sanatorium or third parties to secure their legal interests will be reflected. In this case, the video in question can be retrieved and stored until the legal interest is served.

9.5. Audio recordings of telephone conversations for the purpose of ensuring and improving the quality of services provided by the Sanatorium and protection of the legal interests of the Sanatorium will be kept for a period not exceeding fifteen days, unless the audio recording reflects possible illegal actions or actions interests. In this case, the audio recording in question can be retrieved and stored until the legal interest is served.

9.6. Records of incoming and outgoing communications (e-mails, postal letters) in order to ensure compliance with the legitimate interests of the Sanatorium will be kept for a period not exceeding two years, unless the communication in question reflects potentially illegal actions or actions, that may assist the Sanatorium or third parties to safeguard their legal interests. In this case, the documents in question may be kept until the legal interests have been secured.

9.8. At the end of the storage period, personal data will be permanently deleted, unless there is an obligation to store it in accordance with regulatory enactments.

9.9. Prolonged storage of your personal data specifically specified in this Policy can only be implemented if:

9.9.1. It is necessary for us to be able to secure the protection of our rights in relation to claims;

9.9.2. There are reasonable suspicions of illegal activities, which are the subject of an investigation;

9.9.3. Your data is necessary for proper handling of a dispute or complaint.

X. The need to provide Personal data

10.1. The obtained personal data is used for the provision of the respective services and realization of the functions of the Sanatorium, to the extent necessary for it, in accordance with the requirements of regulatory enactments. In case the personal data is not provided, the Sanatorium has no legal basis to provide the relevant service to the Data subject.

XI. Changes to the Privacy Policy

11.1. The Sanatorium reserves the right to make changes to its Privacy Policy if certain circumstances change that affect the regulation of personal data processing. The Sanatorium recommends visiting this section regularly for up-to-date information.

11.2. The Sanatorium retains previous versions of the Privacy Policy and they are available on the Sanatorium website.