

Millennium Dental Kft. Privacy and Data Processing Notice

Millennium Dental Kft. (Registered office: 7624 Pécs, Őz u. 3/b; Place of business: 7622 Pécs, Zsinkó István u. 9; e-mail: millenniumdentalkft@gmail.com; telephone: +36 30/620-3911; tax number: 32205015-1-02), as the service provider and data controller, acknowledges the contents of this legal notice as binding upon itself.

The purpose of this Notice is to set out the data protection and personal data processing principles applied by Millennium Dental Kft., as well as the Company's data protection and data processing policy.

Millennium Dental Kft. undertakes to ensure that all data processing activities related to its operations comply with the requirements set out in this Notice and in applicable legislation. Millennium Dental Kft. is committed to protecting the personal data of its clients and partners and considers respect for their right to informational self-determination particularly important. Millennium Dental Kft. treats personal data confidentially and takes all necessary security, technical and organisational measures to ensure the security of the data.

Definitions

- “Personal data”: any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- “Processing”: any operation or set of operations performed on personal data or sets of personal data, whether by automated or non-automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- “Restriction of processing”: the marking of stored personal data with the aim of limiting their processing in the future.
- “Controller”: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- “Processor”: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- “Third party”: a natural or legal person, public authority, agency or body other than the data subject, the controller, the processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.
- “Consent of the data subject”: any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which they signify agreement to the processing of personal data relating to them by a statement or by a clear affirmative action.
- “Personal data breach”: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Categories of Personal Data, Purposes, Legal Basis and Duration of Processing

Millennium Dental Kft.'s data processing activities are based on voluntary consent, contractual obligations or legal obligations. Where personal data relating to the data subject are collected from the data subject, Millennium Dental Kft. provides the data subject, at the time when the personal data are obtained, with all of the following information:

- a) the identity and contact details of the controller and the controller's representative;
- b) the purposes for which the personal data are intended to be processed and the legal basis for the processing;
- c) where the personal data were not obtained from the data subject, the categories of personal data concerned;
- d) where applicable, the recipients or categories of recipients of the personal data.

In addition to the information referred to above, the data subject is also informed of the following:

- a) the period for which the personal data will be stored, or, where that is not possible, the criteria used to determine that period;
- b) the data subject's right to request from the controller access to and rectification or erasure of personal data concerning them, or restriction of processing concerning the data subject, and to object to processing, as well as the data subject's right to data portability;
- c) where processing is based on voluntary consent, the data subject's right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- d) the right to lodge a complaint with a supervisory authority;
- e) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, whether the data subject is obliged to provide the personal data, and the possible consequences of failure to provide such data.

The data subject has the right to obtain confirmation from the controller as to whether or not personal data concerning them are being processed and, where that is the case, access to the personal data and the relevant information.

The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

The data subject has the right to obtain from the controller the erasure of personal data concerning them without undue delay, and the controller is obliged to erase personal data concerning the data subject without undue delay where the applicable conditions are met.

The data subject has the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- d) the data subject has objected to processing; in this case, the restriction applies for the period during which it is being verified whether the legitimate grounds of the controller override those of the data subject.

The controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or

involves disproportionate effort. The controller shall inform the data subject about those recipients at the data subject's request.

The data subject has the right to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller without hindrance from the controller to which the personal data were provided, where the processing is based on consent or on a contract and is carried out by automated means.

Where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to processing of personal data concerning them for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

Where a personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, Millennium Dental Kft., as controller, shall inform the data subject of the personal data breach without undue delay.

Method of Storing Personal Data and Security of Processing

The computer systems and other data storage locations of Millennium Dental Kft. are located at its registered office and on the relevant servers.

Millennium Dental Kft. selects and operates the IT tools used for processing personal data in the course of providing its services in such a way that the processed data:

- are accessible only to authorised persons;
- have their authenticity and authentication ensured;
- have their integrity verifiable;
- are protected against unauthorised access.

Millennium Dental Kft. protects the data through appropriate measures, in particular against unauthorised access, alteration, transmission, disclosure, erasure or destruction, as well as accidental destruction or damage and becoming inaccessible as a result of changes in the technology used.

Taking into account the state of technological development, Millennium Dental Kft. ensures the security of processing through technical, organisational and structural measures that provide a level of protection appropriate to the risks arising in connection with processing.

At the same time, we inform data subjects that electronic messages transmitted over the internet, regardless of the protocol used (e-mail, web, FTP, etc.), are vulnerable to network threats that may result in fraudulent activity, disputes concerning contracts, or the disclosure or modification of information. Millennium Dental Kft. takes all precautions reasonably expected of it to protect against such threats.

Our company does not use a data processor. The data processed by Millennium Dental Kft. may primarily be accessed by authorised internal employees. We do not transfer such data to third parties except where there is a legitimate interest (e.g. debt collection), where required by law, or where the User has given their prior express consent.

Cookies

During visits to the www.millenniumdental.hu website, the Service Provider sends one or more cookies, i.e. small files containing character strings, to the visitor's computer, through which the visitor's browser can be individually identified.

These cookies are sent to the visitor's computer only when certain subpages are visited; they store only the fact and time of the visit to the relevant subpage and no other information.

The cookies sent in this way are used as follows: external service providers, including Google, use these cookies to record whether the User has previously visited the Millennium Dental Kft. website.

If the User does not want Google or other service providers to measure the above data in the manner and for the purposes described, the User may install a blocking extension in their browser.

The "Help" function in the menu bar of most browsers provides information on how to:

- • disable cookies;
- • accept new cookies;
- • instruct the browser to set a new cookie; or
- • disable other cookies.

Customer Relations

If you have any comments, questions or problems concerning our company, our data processing activities, or the use of our services, you may contact us using the contact details available on our website.

Other Matters

For data processing activities not listed in this Notice, information will be provided at the time the data are collected.

Our company reserves the right to amend this Privacy and Data Processing Notice unilaterally, while notifying the data subjects.

Our company does not verify the personal data provided to it. The person providing the data is solely responsible for the adequacy and accuracy of the information provided.

When providing an e-mail address, any data subject also assumes responsibility for ensuring that only they use the service through the e-mail address provided.

We inform our clients that investigative authorities, the Hungarian National Authority for Data Protection and Freedom of Information (NAIH), or other bodies authorised by law may contact Millennium Dental Kft. in order to obtain information, receive or transfer data, or have documents made available.

Procedural Rules

The controller has 30 days to provide information concerning personal data, to erase data, or to rectify data. If the controller does not comply with such a request from the data subject, it shall provide the reasons for the refusal in writing within 30 days.

Data Protection Authority

Complaints may be lodged with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH):

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)
1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, P.O. Box 5.

Telephone: 06.1.391.1400

Fax: 06.1.391.1410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>