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1. Why this privacy statement?

In this privacy statement for clients and visitors to the website, Acibadem International Medical Center (IMC) (hereinafter also referred to as: “we” or “Acibadem IMC”) describes how we process your personal data. Acibadem IMC is responsible for the processing of personal data within the meaning of the General Data Protection Regulation (“AVG”).

If you are a client of Acibadem IMC, this privacy statement is intended for you. Here you can read what we use your personal data for, how the protection of your privacy and personal data is guaranteed and what your rights are with regard to the processing of your personal data.

For a question, suggestion and / or complaint about the processing of personal data or the exercise of your rights, please contact klachten@acibademimc.com.

The Privacy Officer will answer your question or ensure that your question reaches the right person in the organization. We have also appointed a Data Protection Officer (DPO). You can reach our FG at fg@acibademimc.com

Rapid technological developments, changed internal processes or changed laws and regulations sometimes make it necessary to adjust this privacy statement. You can see from the date below when the last adjustment took place. The latest version of this privacy statement can be found on our websites.

2. What do we mean by processing personal data?

This privacy statement is about the processing of personal data. What does this mean?

Personal data (according to the GDPR):

all information about an identified or identifiable natural person. This means that information is either directly about someone or can be traced back to this person. For example your name and address, but also about your medical situation.

Processing (according to the GDPR):

by processing we actually mean everything that can be done with personal data, such as collecting, recording, organizing, structuring, storing, modifying, retrieving, consulting, using, providing and disseminating, making available, aligning or combining, shielding, deleting or destroying.

3. From whom do we process personal data?

We process personal data if you:

- visit our website,
- make an appointment with us,
- undergoes (medical) treatment with us,
- receive care from us,
- has contact with us via, for example, the website, SMS, e-mail, telephone or by post.

We may also ask for personal data of your partner and / or children, for example in connection with accessibility during an operation, authorization to make appointments or heredity questions in the context of your medical treatment.

4. What data do we process about you?

We process your personal data in order to provide you with the best possible care. This concerns client data, financial data and other data. We need this information from you in order to be able to execute the treatment agreement with you. We are legally obliged to use or store some data. We refer to all these different types of data as your "personal data" in this privacy statement. Much of this data is so-called 'special' or 'sensitive' personal data. Examples of this are your medical data and your BSN.

4.1 Personal data

When you come to us for an initial consultation or treatment, we ask you for your contact details (such as your name, address, telephone number and e-mail address), date of birth, the details of your health insurance, the referral letter, care domain number, your doctor, your pharmacy. and possibly other healthcare providers involved. In order to help you as best as possible, we ask you to go through a number of questionnaires with questions about your clinical picture, the medications you are taking and other complaints / conditions you may have. We ask you for your ID to make sure it is you for your security and to prevent fraud. We are also legally obliged to register your Citizen Service Number (BSN) and use it for identification.

We use your e-mail address to send your appointment confirmation, general information and questionnaires or surveys.

As part of the provision of care, we maintain an (electronic) client file. All data relating to the care provided to you will be stored in your file. This includes appointments, consultation reports, visual material (photos and film) and results of laboratory tests. If you call us, we will keep the date and time of the conversation in your file. Our employees can make a note about the content of the conversation.

4.2 Financial data

If you receive care from us, this care must be registered in accordance with certain rules and in many cases also be declared to the health insurer. For this we process, among other things, policy data, diagnosis data and exported.

4.3 Other information

Website

When you visit our website you can provide certain personal data. Personal data that you enter via our website, such as your name or address, will only be used by Acibadem IMC for the purpose for which you provide them. For example to get in touch with you or to send you information.

Cookies

In addition, we use cookies on our websites, for example, to improve them.

Where necessary, your permission is requested for the placement of cookies. For more information, see our cookie statement on our Acibadem IMC websites.

Camera surveillance

At some locations, camera surveillance is used at the entrances and exits of the building, parking lot (s) and in some cases also in the waiting areas. We do this to protect ourselves and our clients as well as possible against theft, abuse, destruction or other criminal behavior and for client safety (for

example, to signal whether someone becomes unwell or falls. These camera images are kept for a maximum of 4 weeks, unless stored longer. necessary in connection with an incident.

We will inform you in advance about the camera surveillance, for example by pointing out the camera surveillance in our clinics upon arrival. Only designated persons have access to the stored images.

5. How do we get your personal data?

We receive a large part of the personal data directly from you. For example, if you visit our website and / or request information, during registration, consultations and treatment, if we are in contact with you or if you undergo surveys or complete questionnaires.

We also receive personal data from other healthcare providers, such as your general practitioner when you have been referred or when we take over your file from another healthcare provider (with your permission).

With the information you provide and that we receive from others, we get a better and more complete picture of your health status. Your permission is always requested for requesting medical data from other healthcare providers.

6 What do we use your data for?

Acibadem IMC collects and stores your personal data for various purposes. The main goal is to provide you with optimal, high-quality care. Other goals include claiming for care, complying with legal obligations and preventing fraud.

6.1 Identification and fraud prevention

Before you have your first appointment at one of our clinics, you will be asked to show proof of identity, such as your passport or ID card. We want and must establish that you really are who you say you are. We do not make a photocopy of your ID. We do ask if we can take a picture of you to save in your client file. In order to guarantee safe care, we are obliged to check your identity over and over again, at every step you take in the care process. If we have a photo of you, we can do this quickly and easily without you having to keep showing your ID or providing unique identifying information (such as a combination of name, date of birth, address). You are of course not obliged to have a photo taken.

6.2 The provision of care

Acibadem IMC processes your personal data for the implementation of the medical treatment agreement in the context of the care provided to you. We register the data that you provide to us from the first contact. In order to provide good care, we need to know a lot about your health, medicine use and medical history and sometimes things about how you live (for example about the use of alcohol or smoking). We also register what takes place in the context of the provision of care to you and we store, among other things, photos and film images.

Processing as part of this care provision also includes:

- sending appointment confirmations and the invitation to the (future) client portal;
- informing your doctor during and after the treatment. If you have been referred by a healthcare provider other than your general practitioner, we will also inform the referrer. If you do not want us to inform these care providers, you can indicate this to us;
- providing data in the context of your treatment agreement to other care providers who perform part of the care on our behalf, for example a blood laboratory.

When transferring to another healthcare institution, we will only provide a copy of the file to the healthcare institution concerned with your permission

6.3 Relationship management

We process your personal data in a personalized environment. In addition, we use your personal data for sending newsletters, if you have given permission for this.

6.4 Quality of care provision

To guarantee the high quality and safety of our care provision, we have set up various procedures and (control) systems, internal and external audits take place and we participate in (national) registration systems for care. We also conduct scientific research or provide our cooperation by (anonymously) providing data. Below we explain how we do this, why we do this and how we ensure that your privacy is guaranteed.

We analyze data related to the care provided and its administrative processing based on internal and external quality and safety measurements. Physicians and staff can use this information during internal quality discussions with the aim of improving the quality of care.

We do not ask for permission when passing on data to external parties, for which Acibadem IMC has a legal obligation to notify the supervisory authority, such as in the event of a calamity.

6.4.1 Internal quality management system

The internal quality management system consists of several parts, including internal audits, questionnaires, including the client satisfaction survey and the outcome survey. For this we can send questionnaires to our clients.

Other questionnaires

We can also send other questionnaires. We will of course also inform you about the purpose of this other questionnaire.

7. External quality monitoring

7.1 Quality reviews

To promote the quality of our care, in addition to internal quality audits, quality audits (peer review) are also carried out by external parties. Part of these visitations can be a file review, in which client files are selected from a random sample. These visitations are only carried out by persons who themselves have a duty of confidentiality. As part of the registration of our medical specialists, mandatory quality inspections are carried out by the scientific associations of the various specialties.

7.2 Registration systems for healthcare

For quality registration and reference, we periodically supply (mandatory) information to:

- National registration of care (www.dhd.nl)
- National Health Care Institute (www.zorginstituutnederland.nl)
- Health and Youth Care Inspectorate: risk indicators (www.igj.nl) Dutch Institute for Clinical Auditing (www.dica.nl)
- National Registration of Orthopedic Implants (www.lroi.nl)
- Prevention of Hospital Infections through Surveillance (PREZIES) (www.prezies.nl) Transfusion and Transplantation Reactions in Patients (TRIP) (www.tripnet.nl)
- European Registry for Abdominal Wall Hernias (EuraHS) (www.eurahs.eu/)

This information can be used for quality comparison with other agencies and institutions with the aim of improving the quality of our care. Your data will always be used anonymously, unless otherwise prescribed by the government. Where necessary, we ask for your permission.

7.2.1 Feedback to the referrer

We always send feedback to your doctor about your consultation (s) and treatment (s) with us. We do this so that one care provider always has an overview of your health, which benefits the quality and safety of care. If you have been referred by a care provider other than your general practitioner, we will also send the referrer feedback. You can object to this if you do not want this. In that case, report this to the care provider who is treating you. Your objection will then be registered in your file.

If you want us to pass on certain information to another person, the general practitioner or your referrer, we need a written authorization from you.

7.2.2 Complaints

If you submit a complaint about our care provision, this complaint will be handled by a complaints officer. Information about the complaint handling is not stored in your client file. The complaints coordinator keeps its own archive of the handling of your complaint.

7.2.3 Liability

If necessary for the settlement of a damage or a complaint, your data can be forwarded to our liability insurer.

7.3 Claiming care

We use your personal details (name and address details, citizen service number and policy details) and information about the healthcare provided to you to declare healthcare at your health insurer.

If there is uninsured care, we will process your personal data to send you an invoice.

7.4 Compliance with legal obligations

Sometimes we are legally obliged to provide the personal data that we collect and store for the performance of our services to third parties. This includes health insurers, the Dutch Healthcare Authority, the Health and Youth Inspectorate, the police and the judiciary, the FIOD-ECD or other regulators established under public law. However, we will never pass on your data without checking whether we are obliged to do so in that situation on the basis of legislation and regulations or a legally valid order.

8. On what basis do we process your data?

In order to process your personal data, the processing must be based on one of the principles of the GDPR. In the case of Acibadem IMC, this is - depending on the specific personal data - based on a treatment agreement, a legal obligation, a legitimate interest or permission.

8.1 Agreement

We will have to process personal data in order to execute the treatment agreements.

8.2 Legal obligation

Based on specific healthcare laws (such as the Medical Treatment Contracts Act) and tax legislation that apply to us, we must process certain personal data.

8.3 Legitimate interest

We have an interest in improving the quality of our treatments and care. We also have an interest in improving our business operations and entering into partnerships with third parties. We can process your personal data on the basis of a legitimate interest. If we make use of this basis, we always carefully weigh our interests against your privacy interests

8.4 Consent

In certain cases of processing personal data, we ask you for permission to process certain personal data. For example, we ask for your permission for the transfer of a medical file to another healthcare provider. We also request permission if we request personal data from other healthcare providers. We also ask your permission for the use of certain cookies and for sending newsletters by e-mail.

If you have given your consent for a specific processing of personal data, you can always withdraw that consent. From that moment we no longer process your personal data for that purpose.

If the client is younger than 12 years old, it is not his consent that is required, but the consent of the parents / guardian who has authority over him.

If the client is 12 years of age or older, but under the age of 16, in addition to the client's consent, the consent of the parents exercising custody or his guardian is required.

8.5 Partners, relatives and friends

You can have it recorded in your client file that your partner, a family member (for example one of your children) or a friend is the contact person. Only if such a third party is registered as a contact person do we provide information about you, for example information about appointments, treatments and results. After your death, in principle, only a contact person can request information from your client file. If you want us to share information with, for example, your partner or your son / daughter, we ask you to provide a written authorization. We register such an authorization in the EPD.

9. Who are involved in the processing of your personal data?

9.1 Our employees

All employees of Acibadem IMC are bound by medical professional secrecy or a contractual obligation of confidentiality that applies to all information of which they become aware. This duty of confidentiality also applies to medical specialists, temporary employees, self-employed persons hired by us and temporary workers. Employees only have access to data insofar as this is necessary for the performance of their work.

o Every employee who is involved in medical treatment, care and services to a client has access to your personal data;

o A deputy or substitute for the treating physician can view your personal data;

o Employees, not being healthcare practitioners, have access to your personal data to the extent necessary for the performance of their duties. You can think of the IT department, financial administration, the privacy & information security departments, legal affairs, quality, OR planning and call center.

9.2 Third Parties

We engage third parties to achieve the aforementioned purposes, to support the provision of care and the systems we use for this. Think of our suppliers of IT systems. But also parties who take care of - part of the implementation of - the care provision on our behalf, such as pharmacists and hospitals. If these third parties have access to personal data in the performance of their duties, we will ensure that contractual arrangements are made to ensure that your data is treated confidentially and not processed for purposes other than those for which you have provided them to us.

We work together with other healthcare institutions. This is necessary to ensure that good and safe care is always provided. For example, we have partnerships with other hospitals to properly arrange back-up in case of complications or to be able to consult with colleagues. If necessary for your treatment, we share your data with (employees of) these healthcare institutions. We always send feedback to your doctor about your consultation (s) and treatment (s) with us. We do this so that one care provider always has an overview of your health, which benefits the quality and safety of care. We also send feedback to your referrer, if he is not your doctor.

We may supplement the information collected from our clients with data that we receive from third parties in order to obtain a better and more complete picture of the medical file. Your permission is always requested to request data from other parties.

9.3 Transfer to countries outside the European Union

Your personal data may, on behalf of Acibadem IMC, be processed within countries of the European Economic Area (EEA). In some cases, the third parties that process Personal Data for the purpose of providing services and counseling to patients are located outside the European Economic Area ("EEA"), such as Turkey. Our partner Acibadem Teknoloji is located in Turkey. In principle, Acibadem Teknoloji will only have access to your Personal Data and it will only process your Personal Data under the instruction and responsibility of Acibadem International Medical Center. If and to the extent that we share Personal Data with countries that are outside the EEA and do not have an adequate level of security, we will take additional protective measures set by the European Commission in the so-called standard data protection provisions. A copy of these standard provisions can be obtained from Acibadem International Medical Center. You can contact us if you would like to obtain additional information about the sharing of Personal Data with parties located outside the EEA.

10. How long do we keep your personal data?

We do not store your personal data for longer than is legally permitted and necessary for the purposes for which we collected your data. How long your data will be kept depends on the nature of the data, the purposes for which they are processed and special circumstances (for example, a liability claim).

The retention period can therefore differ per (category of) data (s).

For the client file, a minimum statutory retention period currently applies of 20 years from the moment the data is included in the file and as much longer as is necessary in the context of good care. For financial data we use the usual retention period of 7 years. In principle, we use a period of 5 years, the statutory limitation period, for all other data, unless a different period is stated. Under certain circumstances it may be necessary to keep your data longer.

If you submit a request regarding your personal data, we will keep your request and the correspondence about the request.

11. What do we do to protect your personal data?

Protecting your personal data is part of good care. Privacy and the protection of personal data has a high priority within Acibadem IMC.

11.1 Security measures

We secure and protect your data in various ways, as we are also required by law, to prevent unauthorized persons from gaining access to your personal data. Various technical and organizational measures have been taken in line with the applicable standards for healthcare institutions. Your personal data is secured both physically and logically so that only authorized employees can view your data. The process of obtaining, processing, storage, transport and destruction of data is carefully monitored. Our employees receive training in the field of privacy and information security. We make agreements with parties with whom we share your data, in which they are also held responsible for handling data in the same careful manner as we do. Privacy and security audits take place periodically.

11.2 Not optimal security? Report it to us.

Despite the fact that we consider the security of our systems very important, it is possible that there is a weak spot. If you have found a weak spot in one of our systems, please let us know so that we can take additional measures as quickly as possible. You can reach us via fg@acibademimc.com. We would like to work with you to better protect our customers and our systems.

11.3 Data breach

If a data breach should occur, we will report this to the Dutch Data Protection Authority in accordance with the applicable regulations if required. In the event that the data breach could affect your privacy, we will inform you as soon as possible. We will then tell you what the data breach entails, what we and you can do to keep the damage as limited as possible and where you can go with questions about the data breach.

12. Your rights with regard to the processing of your personal data

12.1 Access or copy of personal data / file

You have the right to inspect your client file and personal data. The authorized representative you have specified as a contact person can also inspect your file. Parents and legal representatives are allowed to view the file of their children under the age of 12. For their children aged 12 to 16, they need permission from their children to view. Anyone aged 16 or older decides independently about (permission to) access.

Your treating physician is always involved in the submitted request. A request for access to your own file can be (partially) refused by your attending physician if access is harmful to the privacy of someone else. We are of course reticent about this.

After death, professional secrecy remains in effect. This means that your next of kin are not entitled to view (parts of) your file. This is only possible if your consent can be assumed or if there are compelling interests. If you want to be sure that a representative can inspect your file after your death, you must give permission for this during your life, for example by having someone included as a contact person in your client file.

12.2 Correction or supplementation of your personal data

If you think that your personal data is not (any longer) correct or complete, you can request us in writing to adjust the data. In principle, we decide within 1 month whether we can meet your request. If we do not want to make changes to your file, we will clearly indicate why we are not doing this. If necessary, we will contact your treating physician in connection with your request.

You can also have a supplement included in your file. A supplement may, for example, be a statement written by you in which you set out your views on the treatment. Or a view of another care provider (second opinion) that differs slightly or is an addition to that of your practitioner. You can indicate this to your practitioner who will include it in your file as a supplement to his findings.

12.3 Deletion of your personal data

You can request us in writing to remove (part of) your data from the file. In principle, we will decide within 1 month whether we can meet your request. If we do not want to delete your data, we will always explain to you why we do not want or cannot do that. Your treating doctor is always involved in your request for removal.

12.4 Information about data processing

You have the right to information about the processing of your personal data within our organizations. We want to inform you as completely as possible by means of this privacy statement. If you have any questions or would like to receive specific information from us, you can submit a request to us.

12.5 Portability of your data

You may request us to transfer your personal data directly to another person, for example to another healthcare provider. Where possible, we cooperate with such a request. If a direct transfer is not technically possible, we will provide you with a copy that you can take to the other healthcare provider.

12.6 Objection

You can object to the use of your personal data. If we honor your objection, we will stop processing unless there are legitimate grounds for the processing. For example, if there is a legal obligation for us to keep or share certain personal data with third parties. If necessary, your treating physician will be involved in your objection to the processing. A rejection of your objection will always be motivated by us.

You can also object to the use of your personal data that we process on the basis of a legitimate interest (including direct marketing).

12.7 Restricting the Use of Your Personal Information

In certain cases you have the right to request a restriction of the processing of your personal data. This is the case, for example, if you have indicated that incorrect personal data has been included in the file, but we have not checked this (yet). You can then request to temporarily limit the processing of your personal data. Even if you have objected to the processing of certain personal data or if your personal data is no longer necessary for us, but you still need it in the near future, the processing of the data may be limited. We will respond to such a request within one month at the latest and we will motivate a rejection of your request.

12.8 Withdrawal of consent

If you have given permission for a specific data processing, you can always withdraw it. You can indicate this to the person or at the place where you have given permission.

12.9 A complaint about my data processing

We do everything we can to prevent complaints. You can reach our privacy team via fg@acibademimc.com. If you have a complaint about the processing of your personal data, you can also submit a complaint to the Dutch Data Protection Authority. Of course we hope that you will first report any complaint to us, so that we can resolve it together with you.

12.10 Submitting a request

You can submit your request by sending an email to fg@acibademimc.com.

Because your request will often be based on medical data, we always ask you to identify yourself. So always bring your ID with you. If you submit a request online, we may ask you to enclose a copy of your ID (photo and BSN number protected). This copy is only used to verify your identity. We want to prevent others than yourself from submitting a request regarding your personal data.

13. How can you reach us?

For a question, suggestion and / or complaint about the processing of personal data or with regard to exercising your rights, please contact fg@acibademimc.com

The Privacy Officer will answer your question or ensure that your question reaches the right person in the organization.