

Privacy Policy

I Purpose

The purpose of this policy is to provide natural persons – data subjects – with information regarding the purpose, scope and protection of personal data processing, the duration of processing, and the rights of data subjects during the collection and processing of data, as well as when data is transferred to competent authorities or another data controller.

II Abbreviations and terms used

Processor	a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
Processing	any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means.
Consent of the data subject	any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of his or her personal data.
Personal data / data	any information relating to an identified or identifiable natural person – the data subject.
Controller	a person (the Company) who, in relation to the processing of personal data, determines the purposes and means of processing personal data, and is responsible for the processing of personal data in accordance with the requirements of applicable legislation.
Recipient	a natural or legal person, public authority, agency or other body to whom personal data is disclosed – regardless of whether they are a third party or not.
Third party	a natural or legal person, public authority, agency or body other than the data subject, the controller, the processor and the persons in the direct authority of the controller or processor who are authorised to process personal data.
GDPR	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
Health data	personal data relating to the physical or mental health of a natural person, including the provision of healthcare services, and which reflects information on their state of health.

III Basic provisions

1. Data controller and contact details

- 1.1. The controller of personal data processing is Vītols un Vītols, SIA (hereinafter – the Controller), unified registration No. 40203107610, registered office: Rīga, Aizvēža iela 1, LV-1030, telephone: +371 26 412 412, website: <https://vitolaklinika.lv/>; email: info@vitolaklinika.lv.

2. Applicable legislation:

- 2.1. GDPR;
- 2.2. Personal Data Processing Law;
- 2.3. National Cyber Security Act (NKDL);
- 2.4. Medical Treatment Act;
- 2.5. Cabinet of Ministers Regulation No. 265 "Procedures for the Management of Medical Records";
- 2.6. The Patients' Rights Act.

3. Purposes of personal data processing:

- 3.1. Compliance with regulatory requirements;
- 3.2. Conclusion and performance of contracts;
- 3.3. Protection of the controller's interests, including ensuring physical and information security;
- 3.4. Provision and administration of healthcare services, including patient registration, patient identification, conducting medical consultations and procedures, carrying out medical examinations, reviewing patient and visitor complaints

and conducting quality control, communication and record-keeping, promoting loyalty, measuring satisfaction, promoting brand recognition and popularity, conducting clinical trials, and implementing epidemiological surveillance measures for infectious diseases.

4. Categories of personal data processed by the controller

- 4.1. Data collected and processed in the course of providing and administering healthcare services:
- patient's first name, surname, personal identification number or date of birth, correspondence address, registered address, telephone number, email address;
 - guardian's first name, surname, personal identification number or date of birth, correspondence address, registered address, telephone number, email address;
 - health status, diagnosis;
 - information regarding disability, previous medical treatment, past illnesses and injuries, allergies, and recently taken medication;
 - degree of kinship with other family members;
 - social status;
 - data of a minor (first name, surname, personal identification number or date of birth, correspondence address, registered address);
 - data regarding visits to the controller's website;
 - visual diagnostic examination data: visual diagnostic images and results;
 - data on laboratory test results.

5. Sources from which the data subject's personal data is obtained:

- 5.1. Public databases;
- 5.2. Documents and information provided by data subjects;
- 5.3. Results of investigations into data subjects;
- 5.4. Data from other controllers, processors and sub-processors;
- 5.5. Data from the controller's computer network equipment;
- 5.6. Data relating to visits to or browsing of the controller's website <https://vitlaklinika.lv/>.

6. Data subject data processing process:

- 6.1. identification of data subjects;
- 6.2. data obtained during the diagnostic process;
- 6.3. data obtained when the data subject communicates electronically with the controller's server.

7. Processing of the data subject's cookies

- 7.1. Cookies are small text files that are created and stored on the data subject's device (computer, tablet or mobile phone) when visiting the controller's websites. Cookies "remember" the user's experience and basic information, thereby improving the user experience of the website.
- 7.2. Cookies are used to process aggregate user behaviour and website usage history, diagnose problems and shortcomings in the website's operation, collect statistics on user behaviour, and ensure the full and convenient use of the website's functionality.
- 7.3. If the data subject does not wish to use cookies, this can be done in their browser settings; however, in such cases, the use of the website may be significantly impaired and hindered. Stored cookies can be deleted via the browser settings on your device by clearing the cookie history.

8. Data retention period

- 8.1. The data retention period is:
- 8.1.1. until the retention period specified in the applicable legislation has expired;
- 8.1.2. for as long as necessary to fulfil and protect the controller's legitimate interests;
- 8.1.3. until the data subject's consent remains valid.
- 8.2. Upon expiry of any of the periods referred to in clause 8.1, all data shall be deleted or anonymised.

9. Sharing and disclosure of the data subject's personal data

- 9.1. Personal data is not transferred outside the European Union or the European Economic Area.
- 9.2. In order to comply with the provisions of regulatory enactments, the controller may share the data subject's data with other medical practitioners and institutions, law enforcement authorities, courts or other institutions.
- 9.3. The controller will disclose data only to the extent required by applicable legislation, including the GDPR and the Personal Data Processing Act.

10. Description of technical and organisational security measures ensuring the protection of the data subject's personal data

- 10.1. Within the framework of data processing, the rights of individuals are protected through the use of access control and monitoring functions for information systems, information resources and workstations.
- 10.2. The server computers used for data processing are located in the data centre of an external service provider, which is protected by access control and security systems.
- 10.3. Registers containing personal data are separated from publicly accessible information networks by means of technical security measures.
- 10.4. Persons processing personal data are subject to a duty of confidentiality arising from their employment contract, the controller's internal regulations, and/or have signed a confidentiality agreement in relation to these matters.
- 10.5. Regular data backups are ensured.
- 10.6. The controller accepts no liability for any unauthorised access to or loss of the data subject's data if this is beyond the controller's control, for example due to the data subject's fault or negligence.

11. Profiling logic

- 11.1. In certain cases, the controller may carry out profiling of individuals and make decisions based on such profiling, if this is provided for by applicable legislation, or if it is necessary to fulfil a contract previously concluded with the data subject, or if prior consent has been obtained from the data subject for such processing, or if such processing of personal data is justified by the controller's legitimate interests.

12. Rights of the data subject

- 12.1. In accordance with the applicable legislation, the data subject has the following rights regarding the processing of their personal data:
 - 12.1.1. the data subject has the right to receive information regarding the processing of personal data carried out by the controller and the exercise of the data subject's rights;
 - 12.1.2. the data subject has the right to receive confirmation as to whether their data is being processed;
 - 12.1.3. the data subject has the right to access their data and receive information regarding the purposes of data processing and the legal basis for processing, the categories of data, the recipients of the data, the retention period, information on other sources of data if personal data has been obtained from third parties, the profile established (in the case of profiling), guarantees, if the data has been transferred to a third party or an international organisation;
 - 12.1.4. the data subject has the right to receive information on whether the provision of personal data is required by law or contract, or whether the provision of data is a prerequisite for entering into a contract, as well as information on the fact that the data subject must provide personal data and the consequences should such data not be provided;
 - 12.1.5. the data subject has the right to be informed about automated decision-making, including profiling, and its consequences;
 - 12.1.6. the data subject has the right to be informed in advance of any new purpose for data processing;
 - 12.1.7. the data subject has the right to object to data processing and to withdraw their consent to data processing, insofar as this is not restricted by applicable legislation and does not conflict with the controller's legitimate interests;
 - 12.1.8. the data subject has the right to request the rectification of data if the data is incorrect;
 - 12.1.9. the data subject has the right to data portability;
 - 12.1.10. the data subject has the right to request the restriction and/or erasure of data, provided this does not conflict with the requirements of applicable legislation or the controller's legitimate interests;
 - 12.1.11. the data subject has the right to lodge a complaint with the State Data Inspectorate of the Republic of Latvia regarding the use of personal data if the data subject considers that their rights and interests have been infringed in accordance with the applicable legislation on personal data protection;
 - 12.1.12. the data subject has the right to be informed if a personal data breach has occurred in relation to their personal data, which may pose a high risk to the data subject's rights and freedoms.
- 12.2. Information to which the data subject is entitled upon request, and which the controller is obliged to provide in accordance with the GDPR and the requirements of this policy, shall be provided free of charge and no later than one month (with the possibility of extending this period by a further two months) after receipt of the data subject's request. If the data subject's request is manifestly unfounded or excessive, including where it is repetitive, the controller is entitled to refuse to comply with such a request or to charge the data subject a fee for providing the information or carrying out the requested action.
- 12.3. The controller shall ensure the exercise of the aforementioned rights of the data subject to a data subject whom the controller has duly identified.
- 12.4. In certain cases, a person's rights may not be exercised or may be restricted if this is justified by the controller's legitimate interests.
- 12.5. To exercise the above rights, please submit a written request to the controller.

13. Contact

13.1. Address: Mihaila Tāla iela 1, Rīga, LV-1045.

13.2. Email: info@vitlaklinika.lv

13.3. Tel. +371 27 835 618, +371 26 412 412

13.4. The controller is entitled to regularly improve or supplement the privacy policy. The controller will inform the data subject of any changes by publishing the current version of the privacy policy on the website <https://vitlaklinika.lv/>.