

Privacy Policy and Terms of Use of the Website of ReFocus Silmakeskus OÜ

ReFocus Silmakeskus OÜ (hereinafter **ReFocus Silmakeskus**) is a medical enterprise that provides specialised medical doctor services in the field of ophthalmology, incl. eyelid surgeries for a fee (hereinafter the **Services**).

ReFocus Silmakeskus values your privacy and takes all measures of precaution (incl. administrative, technical and physical) to protect the personal data of you as a patient.

ReFocus Silmakeskus reserves the right to revise the Privacy Policy and the Terms of Use of the website at any time, notifying you thereof on the website of the clinic at www.refocus.ee.

Collection of personal data and controller

To provide you with the Services, ReFocus Silmakeskus must also process your personal data, incl. more sensitive data, i.e. data of special categories, which also include your health data.

The personal data processed by ReFocus Silmakeskus include, above all, your first name and surname, personal identification code or date of birth, telephone number, e-mail address, place of residence, current account number and other data required for the provision of the Services, as well as data concerning your health.

Personal data are transferred to ReFocus Silmakeskus by you, above all:

- when you make an appointment for a consultation or examination (by telephone, e-mail or via the website);
- when you register for a surgery;
- when you communicate via the communication application on the website;
- in the course of provision of the Services, thereby the recording of the procedures, examinations or other activities done to you may prove necessary for the purposes of recording the Services; in such an event, you are notified thereof before commencing the provision of the Services;
- if you send us a request for clarifications, a notice, a request for information, a complaint, a thank-you letter or a letter with other contents.

Upon processing the personal data received from you, ReFocus Silmakeskus is their **controller** within the meaning of the data protection legislation.

Principles of processing personal data

ReFocus Silmakeskus processes your personal data in accordance with the data protection principles recognised in the Republic of Estonia and in the European Union – above all, the principles of lawfulness, transparency, purposefulness and

minimalism – and requirements established in the governing law, and always respects your interests, rights and freedoms upon processing your personal data.

Ground and scope of processing personal data

In accordance with the Health Services Organisation Act, ReFocus Silmakeskus as a health service provider has the right to process your personal data, including health data, for the purpose of providing you with the Services. ReFocus Silmakeskus processes your personal data upon provision of the Services solely to the extent that is necessary for the attainment of the aforementioned purposes.

The processing of your personal data may be necessary also for the performance of the duties and obligations of ReFocus Silmakeskus arising from legislation (for example, in connection with inserting information into the e-health information system, documenting health services, organising accounting, etc.).

For the purposes of protecting the personal data of other patients, it is permitted to take photos and make audio and video recordings in ReFocus Silmakeskus only with the consent of the board of ReFocus Silmakeskus.

ReFocus Silmakeskus does not process your personal data for the purpose of sending you newsletters and marketing offers.

Responding to a request

A response to a person's request is given, depending on their preference, either by telephone or e-mail. If a person wishes to receive a response by post, the response is given either by unregistered or registered mail, depending on the sensitivity of the information. At your request and if it is technically possible (i.e. above all if you have an ID card issued by the Republic of Estonia), ReFocus Silmakeskus uses encryption upon transferring information containing your personal data.

Retention of personal data

Under § 769 of the Law of Obligations Act, the health service provider must document the provision of health services to the patient in accordance with the requirements and retain the corresponding documents.

ReFocus Silmakeskus retains the collected personal data both on paper as well as electronically in the information system. ReFocus Silmakeskus retains personal data until further claims may arise from a contractual relationship or until required by legislation. ReFocus Silmakeskus retains documents in accordance with the retention terms set out in the Regulation of the Minister of Social Affairs titled 'Conditions of and Procedure for Documenting the Provision of Health Services and Retention of these Documents': for instance, data related to making an appointment is retained for 30 years; personal data recorded in your individual health records are retained for 110 years starting from your birth, etc. The personal data that are no longer

needed for the provision of the Services to you or for the performance of the retention obligations provided by legislation are erased after a reasonable time.

Transfer of personal data and processors

ReFocus Silmakeskus processes your personal data usually in the European Economic Area and does not transfer them to third countries or to international organisations. If ReFocus Silmakeskus does that, it ensures that your personal data is transferred only to such third country or international organisation that follows requirements equivalent to the personal data protection rules in force in the European Economic Area.

ReFocus Silmakeskus maintains the confidentiality of your personal data and does not transfer them to third parties, unless it is necessary for providing you with the Services where you have granted ReFocus Silmakeskus explicit consent thereto or there is another legal ground for it (e.g. under the law). In order to properly and securely protect personal data upon transfer, ReFocus Silmakeskus uses modern security measures.

In certain cases it is necessary to use third parties, i.e. processors, for processing personal data. Processors process your personal data on behalf of ReFocus Silmakeskus only where it is necessary for the purpose of processing and on the condition that they ensure the level of protection of the personal data required by legislation. ReFocus Silmakeskus uses, above all, the following processors upon processing personal data (by category):

- persons who maintain national databases to which personal data must be transferred in accordance with the legislation in force and to which personal data are transferred via the health information system which, in turn, communicates with other national databases via the X-road data exchange layer. ReFocus Silmakeskus transfers personal data to the health information system only to the required extent and in a manner and form that ensure the security of the personal data;
- other IT service providers who ensure the security and systematic retention and processing of your personal data (e.g. cloud service providers and server hosting service providers) and the functioning and development of the web environment and other software required for the provision of the Services of ReFocus Silmakeskus;
- providers of accounting services.

Your rights

You have the right to access the data collected about you and receive an electronic printout thereof.

We comply with your request to correct, terminate the use of or erase your data if it is reasoned and meets the requirements provided by law.

Applying for a job

If you apply for a job in ReFocus Silmakeskus, ReFocus Silmakeskus processes only the information disclosed by you and information obtained about you from public sources.

In the recruitment process, only the employees participating in the recruitment process or relevant service providers involved in the recruitment project can access the documents of a candidate. The documents and data of candidates are not disclosed to third parties. The data of candidates are not disclosed to other candidates.

ReFocus Silmakeskus presumes that it is allowed to communicate with the persons whom the candidate has indicated as its references without any additional authorisation.

ReFocus Silmakeskus retains the data of unsuccessful candidates solely with the consent of the latter for the purpose of participating in a future competition. Upon retention of data, the full name of the person is indicated. In other events, the data of an unsuccessful candidate are erased one year after the end of the recruitment project in accordance with § 25 of the Equal Treatment Act.

Disputes and contact details

If you have any doubts or proposals regarding how ReFocus Silmakeskus processes or protects your personal data, you can always contact Tiia Teesalu, the data protection officer of ReFocus Silmakeskus, by e-mail info@silmakeskus.ee and we will jointly find a solution on how to further enhance your privacy. If you find that ReFocus Silmakeskus has infringed upon your rights upon processing your personal data, you can file a complaint with the Data Protection Inspectorate.

Terms of Use of the website

By visiting the website www.refocus.ee of ReFocus Silmakeskus you consent to the following terms.

Website security

The website uses the required means to protect the integrity, accuracy and privacy of the personal data collected via the website. We have taken reasonable precautionary measures to protect information against loss, misuse and alteration. The Security and Privacy Policy is regularly revised and, where necessary, updated. Only authorised persons have access to your information.

The website www.refocus.ee uses an updated SSL certificate that allows for using a private encrypted communications channel (HTTPS) on the public Internet, with the help of which the transmitted data remains confidential and intact.

Intellectual property rights

The contents of the entire www.refocus.ee website (texts, graphics, names, images, numbers, drawings, logos, icons, recordings, software, etc.) is the property of ReFocus Silmakeskus, its licensees and partners. All the rights not herein explicitly granted to the user are reserved.

The copying, transfer, modification, recording, publication and dissemination of the contents of the website of ReFocus Silmakeskus or parts thereof without the prior written consent of ReFocus Silmakeskus is prohibited.

Disclaimer

ReFocus Silmakeskus reserves the right to, at any time and without any advance notification, change the Terms of Use and contents of the website. ReFocus Silmakeskus is not responsible for ensuring access to the website www.refocus.ee.

Likewise, ReFocus Silmakeskus is not responsible for any damage caused by errors, data system or data transmission interruptions or unavailability or for any damage caused by malware or computer viruses.

The same applies to third-party websites whose links are on the website or to which the website refers.

The website www.refocus.ee of ReFocus Silmakeskus uses links whose websites are administered by third parties. If you click on any such link, you are taken to the website of some other organisation. Even if there is a connection between the websites of the two organisation, ReFocus Silmakeskus does not have any control over the third-party website. Each of them has its own policy for collecting, processing and privacy of personal data. If you visit any such site, you should read the privacy policy of the site before sharing your data.

Information given by the user

The ordinary use of the website of ReFocus Silmakeskus is possible without inserting any personal data. In some cases where personal data are still collected, the data are shared by the user voluntarily and to the minimum extent.

Upon filling in query forms on the website, you are asked for your name, personal identification code, e-mail address, telephone number and, where necessary, other data. The purpose of collecting data is better and more operative service in connection with the activities of ReFocus Silmakeskus. All the personal data submitted by you via the website the submission of which was not prescribed by the

query forms of the website of ReFocus Silmakeskus and which ReFocus Silmakeskus does not need for providing you with the Services are deleted as soon as possible.

The entire information transferred by you via the website is strictly confidential and meant solely for the persons concerned.

The website records the query forms filled in by you in the appointment system or sends them to the e-mail address info@silmakirurgia.ee. Upon receipt of a request for information, you are contacted via the e-mail address or at the telephone number given by you.

The information recorded in the database of the website is deleted if ReFocus Silmakeskus does not (any longer) have legal ground for using your personal data.

The information forms sent by the website to the e-mail address info@silmakirurgia.ee contain the following data:

- the time of the post;
- the location of the poster (IP address);
- name;
- personal identification code;
- telephone;
- e-mail;
- other information inserted by you.

The data inserted by you is not shared, disseminated or in any way altered.

Server log files

The website www.refocus.ee records certain information in the so-called server log files. The information is sent to us automatically via your browser. The sent information includes:

- the browser type and version;
- the operating system;
- a reference to the URL;
- the client's host name;
- the date and time of the request.

The data are not associated with any specific person and the information obtained is not linked to other data sources. The collected data is used merely for identifying any possible problems in our own system or possible abuses of our system.

Use of cookies on the website

To optimise its website traffic and analyse how a visitor uses the website, ReFocus Silmakeskus uses various cookies. With the help of this information ReFocus Silmakeskus can offer a better user experience to the visitor and design and develop

the website in such a manner that the website and services of ReFocus would be of the best possible quality.

A cookie is a small data file that is stored in the computer of the user of the website of ReFocus Silmakeskus. It is used for storing the user's website preferences (e.g. the preferred language) and provide ReFocus Silmakeskus with information on the use of the website. The data file can be read only by the website that saved the cookie. No one else has access to the information. The data file is not harmful, it does not contain viruses or a program code, and it cannot be associated with the website user, their IP address or personal data.

If the website user has not set its web browser up in such a way that it refuses all or certain types of cookies, the cookies are saved as soon as the user visits the website. Everyone has a chance to examine the cookies via the settings of their web browser. If a person prefers not to receive cookies, they should set their web browser up in such a manner that it refuses all cookies or sends out a warning upon receiving a cookie.