

## GENERAL PRIVACY POLICY

*(on data processing related to healthcare services)*

### **on medical data processing by the Clinical Center of the University of Debrecen regarding all medical activities performed concerning health conditions**

**Dear patient,**

**Please read the privacy policy below carefully.**

To be able to provide efficient healthcare it is unavoidable for us to have access to data related to your health condition (**e.g. disease, anamnesis, symptoms etc.**) and your personal identification data (name, home address, etc.), which shall be treated as confidential. Your data we become aware of shall be subject to the rules of medical confidentiality and only the **people** taking part or cooperating in your care or entitled to inspect these data for scientific research – in line with legal stipulations and based on prior permission - may have access to such data.

#### **1. Name and contact information of data controller:**

**Clinical Center of the University of Debrecen (hereinafter referred to as CC UD)**

Registered seat: H-4032 Debrecen, Nagyerdei krt. 98.,  
Postal address: H-4002 Debrecen, P.O. Box 400  
*E-mail address:* [dekk.elnok@unideb.hu](mailto:dekk.elnok@unideb.hu)  
Phone number: +36 52 411 717 (automaton), +36 512 900, +36 52 255 000  
*Represented by:* Dr. Ervin BERÉNYI, president

#### **2. Contact information for the data protection officer:**

*E-mail address:* [egeszsegugyi.tisztviselo@unideb.hu](mailto:egeszsegugyi.tisztviselo@unideb.hu)  
Phone number: +36 52 512 900 / ext. 55792

#### **3. Data processing performed by the controller**

*3.1. Data processing regarding patient care*

*3.1.1. Aim of data processing*

All medical activities performed regarding your health condition, i.e., not only patient care and healing in their usual sense, but also including disease prevention and health promotion.

*3.1.2. Scope of data processed:*

During data processing, the following personal data are processed:

- medical data (e.g., symptoms, anamnesis, use of medications etc.)
- genetic data (e.g., data obtained by means of genetic tests, data on genetic disorders, etc.)
- other special data, if applicable (e.g., data on pathological addictions)

### *3.1.2. Legal basis of data processing:*

Data processing by CC UD is performed on the basis of the paragraph (1) (e) of Article 6 (task carried out in the public interest) of the GDPR and according to the scope of exception defined in paragraph (2), points h) and i) of Article 9 of the GDPR.

Hungarian legislation on data processing:

- recording of data (section 9 of Act XLVII of 1997 on the Protection and Treatment of Health Information and Related Personal Data (hereinafter referred to as the Act on the Processing of Health Data) and section 136 of Act CLIV of 1997 on Healthcare (hereinafter referred to as the Act on Healthcare)
- healthcare, therapy (section 4 of the Act on the Processing of Health Data)
- registry of data [section 28 of the Act on the Processing of Health Data, paragraph (2) of the section 24 of the Act on Healthcare],
- retention of data [section 30 of the Act on the Processing of Health Data, paragraph (3) of the section 136 of the Act on Healthcare],
- transfer of data, if applicable (sections 10, 11, 15, 16 and 23 of the Act on the Processing of Health Data, section 101/C of the Act on Healthcare etc.),

### *3.1.3. Period of data processing:*

The period of data processing may vary based on the retention regulations on certain document types (e.g., outpatient medical records, final medical report, etc.). The details thereof are included in the Document management regulations of the University of Debrecen, which is available on the website of the University of Debrecen ([www.unideb.hu](http://www.unideb.hu)).

### *3.1.4. Scope of parties having access to the data and the categories of addressees*

Personal, medical and genetic data may be managed by the healthcare workers (physicians, qualified healthcare workers, assistants, administrators, etc.) taking part or cooperating in the care of the given patient or entitled to have access due to other reasons (e.g., training of professionals).

Categories of addressees:

- other health care providers (e.g., hospitals, laboratories, the GP of the patient etc.),
- parties to be notified based on regulatory obligations (e.g., authorities, guardian, etc.),
- processors, if any (e.g. IT services, operator).

### *3.1.5. Data transfer to third countries*

CC UD does not, based on general rules, transfer your personal data to third countries, however, in certain special cases (primarily in case of the application of certain IT solutions), data transfer to third countries might occur. In this case, you are always notified in advance by a separate

data processing notification about data processing of this kind and about who the joint controller or processor is.

#### *3.1.6. Automated decision-making*

No decision-making based on automated data processing (including profiling) is made at CC UD.

### *3.2. Data processing related to scientific research*

#### *3.2.1. Aim of data processing*

Scientific research including medical research mostly on humans and research concerning the testing of preparations and medical technology devices for human use.

#### *3.2.2. Legal basis of the data processing:*

Data processing by CC UD is performed on the basis of the paragraph (1) (e) of Article 6 (task carried out in the public interest) of the GDPR and according to the scope of exception defined in paragraph (2), points h) and i) of Article 9 of the GDPR.

Our institution allows insight into your data with the aim of scientific research and allows the issuing of anonymized copies about the data with the same aim for a separate preliminary request, based on authorization by law, in line with paragraphs (1)-(3) of section 21 of the Act on the Processing of Health Data, with the approval of the president of **CC UD** or the health data protection officer of **CC UD**.

In the copies made or in the scientific or other publications your data shall not appear in a way that would enable your identification.

#### *3.2.3. Period of data processing:*

The period of data processing is the same as included in section 3.1.3.

#### *3.2.4. Scope of people having access*

The researcher having submitted a request for scientific research purposes or - on behalf of CC UD - the person allowing insight may have insights into the personal and health data of patients, if such request of the researcher was approved. During access and the scientific research, itself, no copies or records containing personal identification data may be made of the stored data.

## **4. Risks and guarantees regarding the processing of personal data**

### *4.1. Risks*

During data processing by CC UD, primarily the following risks may arise regarding the processed personal data:

- compromise or loss of data or their theft by unauthorized third parties (e.g., compromise of the file containing personal data due to viral attack or other damage, an e-mail sent to false address or with false content, loss of data media containing personal data, etc.),
- intentional or negligent disclosure of data (e.g. unauthorized upload of personal data to a website)
- injury or damage of the data processing system (e.g., hacking of the data processing IT system, data loss due to electronic failure, etc.)

#### 4.2. Guarantees

CC UD will do everything in its power to protect personal data. For such a purpose, it takes every technical and organizational measure necessary to enforce the GDPR, the sectoral laws and other rules on data protection and confidentiality, thus

- it restricts the scope of controllers: only the employees of CC UD may take part in the processing of personal data,
- it restricts the scope of the people allowed to be present in the rooms designated for data processing,
- it keeps data media containing personal media confined, protects the IT systems with strong passwords, and allows access to such systems for authorized people only after appropriate training.

### 5. Opportunities to enforce your rights

You are **entitled to be informed** in advance about data processing, you may **request access** to become familiar with data processing operations, you may request the **rectification, deletion or restriction of the processing** of data and you **may object** against the processing of data. Additionally, you have the right to **data portability**.

If you think that data processing by **CC UD** is not in compliance with legal regulations, you may initiate a procedure at the Hungarian National Authority for Data Protection and Freedom of Information (postal address: H-1530 Budapest, P.O. Box 5, e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) or may request judicial remedy.

**If you have any specific questions regarding data processing** or if you need information in person, please contact the Data protection officer in one of the means of contact specified in section 2 hereunder or contact the data controller directly.

Click **here** for a REQUEST concerning the **exercise of your data subject rights**.