

Tartalom

What is this statement about?	1
The “Data Controller”	2
What happens to your data when visiting the website?	2
What type of Your data is processed when visiting the website?	2
Cookies	2
What Happens to Your Personal Data when Contacting Us Through the Form on the Website?	4
Contact forms	4
Filling out the contact form	5
Contacting via appointment booking form	6
Contacting us via email addressed shown at the website	6
Contacting via mobile or mainline telephone	7
Automatized Data Processing and Profiling?	8
Recipients of Your Personal Data	8
Authorized Recipients of Your Personal Data	8
Third parties	8
Exceptional obligation for discloser	8
Data Transfer to Third Countries	8
Security Guarantees of the Data Processing of Your Personal Data	8
What Rights do You Have Regarding Your Personal Data?	9
Your rights	9
Complaints Regarding Your Rights and Freedoms	10
How can you lodge official complaint?	10
Official complaint	10
How can you lodge claim and seek for legal remedy?	10
Further Information and Inquires	11

What is this statement about?

AVICENNA DENTAL KFT. clinic hereby informs the visitors of the <https://avicenna-med.hu/> website about the practices of processing personal data when website visitors scroll or navigate between pages and when using the contact or booking appointment form on the website. The statement also informs the visitor of website about how carefully the clinic is handling the personal data when the website visitors get in touch

with the clinic via any of the contact detailed listed on the website otherwise. The present Privacy Policy Statement is to express on behalf of all the employees, colleagues, and resident specialists working at the dental clinic how important to us to comply with requirement of the General Data Protection Regulation regarding full and detailed stating of the measures implied for safeguarding lawful and secure data processing. The clinic wishes to emphasize that all the policy and procedures stated in this statement are consider compulsory for the staff and nothing less is expected and guaranteed from contracted service providers.

The “Data Controller” of the <https://avicenna-med.hu/> website (according the definition of GDPR Art. 4. (7):

Name	Avicenna Dental Ltd.
Headquoters	1067 Budapest Podmaniczky utca 33.ép. III. em. 8.;
Tax Number	26701770-2-42
Registration Number	01-09-340041
Authorized representative	Anikó, Dr. Kelemen
Contact	+36 20 395 5218; avicenna@avicenna-med.hu

The website hosting service is provided by

Name: Zedality Számítástechnikai Szolgáltató és Kereskedelmi Kft.

Address: 6000 Kecskemét, Batthyány utca 20.

TAX Number: 12552580-2-03

Company registration number: 03-09-126516

E-mail: info@zedality.com

What happens to your data when visiting the website?

You, as “data subject” with the terminology of the GDPR can be in ease about the data processing of your personal data by AVICENNA DENTAL KFT. as we carry out our data processing activities with due consideration and awareness of required data protection provisions. We respect your rights and freedoms about which we intend to inform you hereby briefly yet comprehensively in an easily understandable manner and we guarantee that your data is handled and processed with liability, consistency, confidentiality and of due control.

What type of Your data is processed when visiting the website?

Cookies

When opening the website, a cookie bar will appear informing you that the website only uses necessary – functional cookies that is lawfully used without your prior consent. However, the cookie plugin updates automatically the information provided for you as soon as other type of cookies is in use and will ask for

your consent for using them. You will have free choice accepting or declining these cookies. We will always respect your choice and prove all times that your preferences are recorded.

Cookies can be grouped in several ways. You can find more information about this at <https://www.youronlinechoices.com/> or detailed information on the types and functions of cookies at the following links: <https://www.allaboutcookies.org/>

We would like to draw your attention to the fact that the websites indicated above are embedded links on the website, therefore the interfaces place cookies on your device as a third party. These cookies are not enabled by default, so to view such content, you will need to enable cookies placed by third parties.

When you open those links, the privacy policy of the given interface will apply to the processing of your personal data. If you wish to block cookies all together, you may do that by setting your browser in such way.

In the case of pictures and/or video recordings of you uploaded to Facebook, Instagram, YouTube and the website interfaces, the Data Controller and the provider of the given interface bear joint responsibility for data management.

Facebook and Instagram are operated by Facebook Inc

Facebook Inc. (1601 Willow Road, Menlo Park, CA 94025, USA)

You can find more information about the cookies used by Facebook:

<https://www.facebook.com/privacy/explanation>

<https://developers.facebook.com/products>

Instagram LLC. (1 Hacker Way, Menlo Park, CA 94025, USA)

You can find information about the cookies used by Instagram and its privacy policy at the links below.

<https://www.instagram.com/legal/cookies>

[https://help.instagram.com/519522125107875/?helpref=hc_fnav&bc\[0\]=368390626577968&bc\[1\]=285881641526716](https://help.instagram.com/519522125107875/?helpref=hc_fnav&bc[0]=368390626577968&bc[1]=285881641526716)

The data controller of cookies managed by Google is Google Inc. (1600 Amphitheater Parkway, Mountain View, CA 94043, USA). You can find more information by clicking on the links below.

<https://privacy.google.com/businesses/adsservices/>

<https://policies.google.com/privacy?hl=en> .

YouTube is also a service of Google, operated by YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

More information <https://www.google.com/intl/hu/policies/privacy>

It is possible to stop your browser from accepting cookies altogether. You can usually find these settings in the "Options" menu of your Internet browser at "Preferences". For more information, see the "Help" menu in your Internet browser. The following links may be helpful, or you can use the "Help" option in your browser.

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari web and iOS](#)

You also can turn off cookies on smartphones by using the "Menu", "Settings", "delete cookie".

You may need to do this again each time you use a different IP address, device, or virtual private network. You can also adjust the global privacy setting or plug-in which should be communicated to use via your browser.

Please see the detailed cookie policy at the following link redirecting you to another page of the website dedicated to the cookie policy and the list of cookies used by the website.

[What Happens to Your Personal Data when Contacting Us Through the Form on the Website?](#)

[Contact forms](#)

If you contact us using the form provided at the website, your name, email address, the nature of inquire and message content is required so that we can provide you sufficient and full information regarding your inquire. The provided details – especially the nature of inquire and message – may contain information about your health which is data of special category.

Please note that medical personal data is only processed via filling out and sending the form with your explicit consent. Therefore, we wish to emphasize and advice you to carefully read the privacy policy so that you are fully aware of what type of personal data you provide and the risks of submitting your letter as well as the measures we execute to minimize these risks and safeguard your personal data and your rights to your personal data.

When you submit your letter or book an appointment via the form of the website, you IP address is in use for the reason to see that you are a real person, not a "robot" and assure that there is no threat of attacking the website. This information automatically removed daily. The purpose of this data processing is necessary to fulfil the IT security protocols for the protection of your data.

Please note that you have the right to withdraw your consent (when the legal ground of data processing is your consent) any time which will be noted and acted upon without undue delay. However, your withdrawal is not affecting the data processing that took place prior to your withdrawal.

Filling out the contact form

If you fill in the form under "Contact Us" menu, you will encounter two checkboxes before clicking on the "submit" icon, and the system will only allow you to submit the form if you tick them. By the first checkbox, you declare that you have read the Privacy Policy and have acknowledged its contents. With the second checkbox, you consent to the start of data processing operations for the purposes of your inquiry. These checkboxes are logged electronically.

Scope: name, e-mail address (which must be filled in), the subject of the request and the content you provide in your message addressed to us via the form; IP address of your device, date and time of your request received.

Lawful basis for data processing: your informed, voluntary given, clearly, and unambiguously affirmation of your consent to the planned processing of your personal data for the purpose you set in your letter. By ticking the checkboxes and submitting your message, you give a clear indication of acceptance of the proposed processing of your personal data. It is a prerequisite of your filled form to be submitted.

Retention time: until the original purpose of your inquiry is fulfilled, i.e. you receive answers to your questions and /or make an appointment. If this is not taking place for whatever reason or you are not available to follow up the inquire, your contact details will be deleted within one month.

In the above scope of data, the following authorized parties have access to the data:

Regarding the <https://avicenna-med.hu/> website contracted a Data Processor, with addendum of DPA (Data Processing Agreement) to the existing contract for website administration, development and maintenance and IT maintenance:

Name: Zedality Számítástechnikai Szolgáltató és Kereskedelmi Kft.

Address: 6000 Kecskemét, Batthyány utca 20.

TAX Number: 12552580-2-03

Company registration number: 03-09-126516

E-mail: info@zedality.com

Any personal data given via the contact form will not be used for reason other than your original inquire, nor will be transferred or disclosed to unauthorised third party.

Contacting via appointment booking form

Making an appointment is easy via the website and you are asked to fill out a very simple form with a few required information and there is the option for you to share any request and notes that you may find important regarding your request. This information goes through the admin page of the website and functions exactly as any other email.

If you fill in the form under "Appointment" menu, you will encounter two checkboxes before clicking on the "Booking" icon, and the system will only allow you to submit the form if you tick them. By the first checkbox, you declare that you have read the Privacy Policy and have acknowledged its contents. With the second checkbox, you consent to the start of data processing operations for the purposes of your inquiry. These checkboxes are logged electronically.

Scope: name, e-mail address (which must be filled in), the booked time for appointment, and the content you provide in your message addressed to us via the form; IP address of your device, date and time of your request received.

Lawful basis for data processing: your informed, voluntary given, unambiguous affirmative act with which you express your explicit consent to the planned processing of your personal data for the purpose you set in your letter. By ticking the checkboxes and submitting your message, you give a clear indication of acceptance of the proposed processing of your personal data. It is a prerequisite of your filled form to be submitted.

Retention time: until the original purpose of your inquiry is fulfilled. The logfiles of the appointment module stores these details.

Please note that the logfiles recording the exact time of your checkbox activities are stored for 5 years so that Data Controller can prove to you or the supervisory authorities that you received information and gave consent prior to any data processing operation.

Contacting us via email addressed shown at the website

The domain service provider of @avicenna-med.hu address is:

Name: 23VNET Kft.

Address: 1132 Budapest, Visegrádi utca 47/B.

TAX number: 12188224-2-43

Company registration number: 01-09-563212

Purpose of data processing: answering any of your request, booking appointment, answering general questions about our services, providing information about any specific issue you may have.

Scope of personal data: name, phone number, the subject of the request and the content you provide in your message addressed to us via the form; date and time of your email received.

Lawful basis for data processing: your affirmative act of consent to the planned data processing expressed by sending the email. By your request the present privacy policy is provided via email at any time otherwise withing on month from the date and time of your letter sent or the first personal visit.

Retention time: until the original purpose of your inquiry is fulfilled, ie you receive answers to your questions and /or make an appointment. If this is not taking place for whatever reason or you are not available to follow up the inquire, your contact details will be deleted within one month.

Please note that the general terms and conditions and data security guarantees of the Domain Provider, the network service provider and our electronic information system infrastructure and protocols ensure the security of our electronic communication by e-mail. We would like to draw your attention to the fact that the Data Controller is not liable for direct or consequential damages due to the vulnerability of electronic communications / internet use that is not its own fault, only to the extent that it occurs due to events attributable to its own negligence.

[Contacting via mobile or mainline telephone](#)

Purpose of data processing: Answering your questions, provide information and other responding to all inquiries of Yours. We do not perform any data processing for other purposes than those related to your initial matter of the communication.

Scope: your surname and first name, telephone number, date of contact, subject of inquiry, any further information you provide either personal or medical.

Lawful basis for data processing: Your given consent expressed by your affirmative act of calling us. We do not use your personal data other than fulfilling your inquiry. You will not receive unwanted calls, letters, offers, advertisements.

Retention time: Data processing of your name, telephone number and the subject of the request based on your consent is going to take place until the purpose of the original inquire is met. Thereafter, in the absence of any other purpose of data processing and other lawful basis (performance of contract or legitimate interest) as well as lack of possibility or success of follow-up of your initiated communication, your data will be deleted from all our devices within a month.

Please note that you have the right to withdraw your consent (when the legal ground of data processing is your consent) any time which will be noted and acted upon without undue delay. However, your withdrawal is not affecting the data processing that took place prior to your withdrawal.

Automatized Data Processing and Profiling?

The clinic and its data processor do not carry out automatized personal data processing and decision making or profiling.

Recipients of Your Personal Data

Authorized Recipients of Your Personal Data

Besides the authorized employee of the clinic, only those partners and service suppliers have authorised access to your personal data, which carries out data processing on behalf of the clinic within the framework of a data processing agreement and according to the terms and conditions of the contract between the parties. We take special care to choose such service providers that guarantee the compliance with the applicable legal provisions.

Third parties

The Data Controller will not share or give access to your personal data to unauthorized parties, use your personal data for marketing purposes, or send unwanted messages, neither will contact you outside the scope of the purpose of your inquiry. It handles the above data strictly and exclusively for the purpose of the original intent. Personal data of yours are not sold or otherwise shared.

Exceptional obligation for disclosure

Please note that in the event of official request, such as authorization of a court, agencies carrying out prosecution, investigation, offense, or the Supervisory Authority (NAIH) or other authorized agencies can have such written official resolution that the Data Controllers is obliged to provide information, disclose, transfer documents including your personal data. In such event and with written resolution of the exact purpose and scope of requested data, the Data Controller shall provide the minimal personal data to the extent that is absolutely necessary to achieve the purpose of the request and will inform you of about the details of such data disclosure (unless it is forbidden by law).

Data Transfer to Third Countries

Transmitting personal – medical – data to countries outside the territorial scope of the Regulation or besides those countries that are considered by EU as “safe” countries will not take place without your specific consent or other special provisions of the Regulation such as EU or member state legal obligation, legal claim or court order, public interest such as contagious diseases.

Security Guarantees of the Data Processing of Your Personal Data

In accordance with the principle of accountability,

- 1) We follow and respects your cookie settings.

- 2) We respect your consent and the withdrawer of your consent.
- 3) We process your personal data with appropriate data protection and data security awareness, and with taking the necessary and reasonable technical, logical and administrative measures according to the risks of the given data processing operation.
- 4) We consider binding the legal provisions and have set our own internal privacy policy rules accordingly.
- 5) We insist, require, and enforce the same level of data protection consciousness from our employee, partners, contracted service providers and data processors.
- 6) We make all relevant decisions and practical steps to be accountable to you at any time of data processing that includes immaculate electronic and manual record keeping of all relevant matters in connection with personal data processing.
- 7) We have in place all the pre-set technical, information technology and administrative measures to prevent, detect and defend your personal data from incidents that may cause data breach.
- 8) We take all reasonable and proportionate measures to ensure that your personal data is available for as long as necessary with appropriate security guarantees to ensure against unauthorized access, alteration, disclosure, deletion, damage, destruction.
- 9) We take care of your personal data with utmost confidentiality, integrity and accessibility both electronically and physically.
- 10) Such measures include limitation of access, recording users and logins, usage of password-protected interfaces, the establishment of strict information security internal rules and compliance. It also includes network and device protection, password-protected administration of data and communication channels and platforms.

If case of 'personal data breach' (as defined by Article 4 (12) of GDPR): meaning 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), depending on the risks held by the incident, the Data Controller will act promptly according to Article 33 GDPR) and without undue delay and when feasible, it will cooperate to with the Supervisory Authority, and if situation necessitate It will notify you in writing without delay.

What Rights do You Have Regarding Your Personal Data?

Your rights

In compliance with GDPR and relevant applicable requirements of law you can turn to the Data Controller when you wish to exercise any of below mentioned rights.

- 1) Right to information (Article 12 of Regulation with reference to Article 13)
 - what personal data,
 - on what legal basis,
 - for what data processing purposes,
 - the source from which they come,
 - how long you treat it,
 - who has access rights and who the recipients of the data transfer are.

- 2) Access your personal data (Articles 15 of the Regulation),
- 3) Right to rectification (Article 16 of the Regulation)
- 4) Right to erasure (Article 17 of the Regulation)
- 5) Right to restrict the data processing (Article 18 of the Regulation)
- 6) Right to data portability (Article 20 of the Regulation)
- 7) Right to object (Article 21 of the Regulation)
- 8) You may lodge a complaint with a presumption of unlawful data processing, (Article 77 of the Regulation)
- 9) Remedies in case of unlawful data processing (Article 79 of the Regulation)

Any inquiries will be examined with due diligence and will be fulfilled without undue delay not later than one month. In case the Data Controller is obliged by law to certain type of data processing which prevents its ability to fulfil your requirement, the Data Controller will explain its reasons with reference to all the relevant legal acts.

Complaints Regarding Your Rights and Freedoms

Even though the Data Controller considers the principles of Regulation as binding upon itself, there might be a situation when you assume violation your rights and freedoms. If that case, please, contact primarily the Data Controller at any of its contact details. Your complaint will be examined and if it is proven to be well founded, the clinic will immediately cease data processing that is adversely affect you. If the extend of unlawful data processing is such, and when it is appropriate, it will cooperate to with the Supervisory Authority, about which It will also notify you in writing.

How can you lodge official complaint?

Official complaint

You may lodge complaints in case of assumed violation of your personal data primarily at the Data Controller, the Royal Dental Clinic, and/or you may lodge complaint at the: National Data Protection and Freedom of Information Authority

Address:	1055 Budapest, Falk Miksa utca 9-11
Postal address:	1363 Budapest, Pf.: 9.
E-mail address:	ugyfelszolgalat@naih.hu
Phone:	+36(30)683-5969 +36(30)549-6838 +36(1)3911400
Fax	+36 (1) 391-1410

How can you lodge claim and seek for legal remedy?

You may lodge claim and seek for legal remedy in case of violation or damage at the court (Article 77 GDPR). If the Data Controller proves damage through unlawful processing of your data or violation of rights

and freedoms due its actions or actions failed to put in place either because of intentional or negligent infringements of Regulation and other relevant legal provisions, and you suffer material or non-material damage as a result of an infringement have the right to receive compensation from the Controller or Processor for the damage suffered. You can file a claim for effective compensation at court according to jurisdiction dependent on permanent or temporary residence.

Find the competent court at the following link: <https://birosag.hu/birosag-kereso> or <http://birosag.hu/torvenyszekek>

Further Information and Inquires

We wish to emphasise that data processing other than the original purpose will not take place, your personal data will not be transferred to third parties and you will not receive unwanted messages or newsletter or any other contacting attempts initiated by us.

All our efforts are to comply with the General Privacy Policy to the extent of the obligation to provide information as well as to provide you with a clear and transparent way of communicating our data management practices. Please feel free to contact us if you have any further questions or any comments regarding the content or the clarity of the information.

AVICENNA DENTAL KFT. Privacy notice is available upon request via e-mail or in person at 1067 Budapest Podmaniczky utca 33.ép. III. em. 8.

We reserve the right to change this information if it becomes necessary to change the circumstances, due to a more detailed guidance by the supervisory authority, modification of legal provisions.