

PERSONAL DATA PROCESSING POLICY

SanoPass SRL, headquartered in Târgoviște, Dâmbovița, str. Gymnasium, nr. 18, et. 1, room 2, postal code 130017, Romania, e-mail: office@sanopass.ro, registered with the Trade Register under no. J15/1721/2018, tax code 40308760, represented by Administrator Mihai Vadan ("**SanoPass**"), has developed this personal data processing policy ("**Policy**") to inform you about the conditions under which we collect, process, use and protect your personal data. Personal Data ("**Personal Data**").

The confidentiality of your data is one of our fundamental commitments and therefore we ensure that the processing of your data takes place in full compliance with the principles set out in applicable law, including but not limited to its General Data Protection Regulation 679/2016 ("**GDPR**").

This Policy is intended to inform you, as a data subject, of how SanoPass, as the Controller of Personal Data, acts in relation to you in accessing and using our web platform, www.sanopass.ro, and the SanoPass application ("**SanoPass Application**"), as well as about the channels of communication that you can get in touch with us for reporting any deviation from the Policy or if you have any questions.

Please read this Policy carefully, as by accepting it, you agree to all the clauses indicated below.

You are under no obligation to provide us with your personal data mentioned in this document. However, if you do not provide us with the data mentioned in this information note it will not be possible for us to provide you with the services you request from us. If you do not agree to these terms of use, please delete the App and do not continue using our services.

In order to have access to the services available in the SanoPass service network, the user must have the quality of recipient of the services. The beneficiary is the user who has access to the Application and medical services offered by the SanoPass partner clinics ("**SanoPass Partners**") based on a medical services subscription offered by SanoPass ("**Beneficiary**"). You may have access to SanoPass services through a third-party organization such as your employer or one of the SanoPass partner companies (the "**Organization**") or directly as a result of purchasing our products directly from the App.

We emphasize that the provisions of this Policy are for informational purposes only and do not affect the rights that the legislation gives you.

1. WHAT PERSONAL DATA DOES SANOPASS PROCESS?

The personal data about you and which we will process are the data obtained directly from you (at the time of registration in the Application), from

The organization you are part of or results from the provision of services by SanoPass Partners.

This Personal Data may include the following categories of data:

- Personal details, such as: name; first name; sex; date of birth/age; personal identification number (CNP); the rest of the information on your identity document.
- medical data (sensitive personal data), such as: history of medical visits; results of the analyses carried out, blood group; treatment recommended by HairTeners SanoPass; any other information that you have. You choose to upload them to the App – Medical File section;
- professional details, such as: employer; position; function;
- geo-location data .

2. HOW DO WE OBTAIN YOUR DATA?

The source of the Personal Data may differ depending on the purpose of the processing. Thus:

- **For beneficiaries of medical subscriptions** , we receive from the Organization or directly from you, as the case may be, the following personal data regarding you: name; surname; contact details (phone number and e-mail address). However, most of the information we obtain directly from you, during the access to the services, or from our Partners, on the occasion of providing the requested medical services, at the time of uploading the documents in the Medical File (by the Partners or even by you)
- **For occupational health services**, the Organization sends us the following data about you that will allow us to identify you, namely: nome; first name; personal identification number (CNP); contact details (telephone number and e-mail address), position and position occupied within the Organization. Also, when drawing up the documents related to occupational medicine, we will obtain from the SanoPass Partner the information established by the legal provisions for the evaluation of your head of work (excluding the information regarding the result of the medical investigations carried out).

We try to keep your data up to date. For this, we are constantly carrying out an activity of collecting and updating your data.

3. FOR WHAT PURPOSE DO WE COLLECT YOUR DATA?

We use your data collected in point 2 to:

3.1. The conduct of the contractual relationship between your employer (The organization)/you and SanoPass

Purpose: issuing subscriptions and processing transactions made by you within the subscription; resolving your complaints.

Duration of processing: the data will be stored for a period of 3 years, calculated from the date of termination of the user status.

3.2. Analysis and statistics on the use of our products

Purpose: optimizing SanoPass products in order to improve the satisfaction of SanoPass customers, beneficiaries and Partners, improve products and services, identify potential problems with our existing services in order to improve them.

Duration of processing: your data will be stored for a period of up to 5 years calculated from the date of termination of the user status.

3.3. Direct marketing and other commercial communications

Purpose: to offer discounts, promotions, product or service launches, the emergence of new medical service providers, etc., both from SanoPass and collaborators (third-party legal entities), who have a contractual relationship with SanoPass.

Duration of processing: the data will be stored for a period of up to 3 years from the date of termination of the user status or immediately, in case of requesting exclusion from communications commercial and marketing.

SanoPass may delete your personal data. personal data when they consider that they are no longer necessary for the purposes for which they were collected.

In any case, you have the right to withdraw your consent to the processing or to object to the processing and, if there are no legitimate and compelling reasons for the processing that prevail, we will cease processing the data.

4. WHAT IS THE BASIS ON WHICH WE PROCESS YOUR DATA?

SanoPass processes your personal data. personal data pursuant to Article 6(1)(a) (b) of gdrs – processing for pre-contractual and contractual purposes, respectively art. 6 para. (1) point

c) gdpr – processing for the fulfillment of legal obligations incumbent on the controller (SanoPass).

Since most of the information we obtain directly from you, it is processed pursuant to Article 6(1)(a) of the GDR – processing based on the data subject's consent .

Also, in the framework of the processing of special categories of personal data (e.g. data regarding your health status), SanoPass asks for your consent in accordance with the provisions of Art. 9 para. (2) point (a) of the GDPR. The carrying out of scientific studies on these categories of data, to the extent that they will be made, shall be carried out on the basis of Article 9 para. (2) point (j) of the GDPR.

Mainly, we process

- your personal data (other than health data) in order to be able to conclude a contract with you, at your request, or to perform a contract with the Organization of which you are a member (by which we undertake to provide you with our services). We also process your data for the fulfillment of our archiving obligations, the obligations to communicate to public authorities. At the same time, there are cases in which we process the data

you on the basis of our legitimate interest, for example to inform you of the expansion of our partner network and to facilitate your access to our services.

- health data are collected taking into account the specifics of our activity, based on your consent, when processing is necessary for purposes related to the assessment of your ability to work, or if processing is not necessary for archiving purposes in the public interest. We may also process your data in situations of medical emergency or other situations in which you are unable (physical or legal) to consent to the processing, in which case we may process your data your non-sensitive for the purpose of protecting the vital interests of you (or another individual).

5. WHAT ARE YOUR RIGHTS? WITH REGARD TO PERSONAL DATA?

You have the following rights in relation to the processing of your personal data. Personal:

- **Right of access:** You have the right to obtain from us confirmation that your personal data is processed by us, as well as information about the specific processing, such as: the purposes of the processing, categories of personal data processing here, the recipients of the personal data, the period for which the personal data are stored, whether we transfer the personal data abroad and how we protect it;
- **Right to rectification:** You have the possibility to request the rectification of your personal data. if you identify that they are erroneous or incomplete;
- **Right to erasure** ("right to be forgotten"): In certain cases, you have the possibility to request the deletion of personal data, i.e. when they are no longer necessary in relation to the purposes for which they were collected, if you withdraw your consent to the processing (and not there is no other legal reason for the processing) or if you object to the processing;
- **Right to data portability:** You have the right to obtain the transfer to another operator of your data that we process or control;
- **Right to object:** in certain situations, you have the right to object to the processing of your personal data by us.
- **Withdrawal of consent:** To the extent that you have consented to the processing of your Personal Data, you may at any time withdraw your consent, without affecting the lawfulness of the consent-based processing prior to its withdrawal.
- **The right not to be subject to any automated individual decision:** you have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects that concern you or significantly affect you. Such a right cannot be exercised when the decision:(i) is necessary for the conclusion of a contract or for the performance of a contract between you and SanoPass; (ii) it is necessary for appropriate measures to be taken to protect your rights, third parties and legitimate interests; or (iii) it is based on your explicit consent.

- **The right to lodge a complaint** with the supervisory authority: you have the right to file a complaint with the National Supervisory Authority for Personal Data Processing ("DPA") in relation to any violation of your rights regarding the processing of your personal data. personal. The contact details of dpa are: Gheorghe Magheru Boulevard 28-30, Sector 1, Postal Code 010336, București, Romania; e-mail: anspdcp@dataprotection.ro. Full list of data protection authorities in the European Union: https://edpb.europa.eu/about-edpb/board/members_en

6. HOW CAN YOU EXERCISE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA? CU CHARACTER PERSONAL?

Certain rights may be exercised directly from the App and by sending an email to dpo@sanopass.ro address. To ensure that the person contacting us regarding your personal data is not responsible for their personal data. personal data is yourself, we reserve the right to verify your identity prior to issuing any type of response to confidential data, precisely for the purpose of ensuring the confidentiality of all data.

As a rule, you can exercise your rights free of charge. However, manifestly unsubstantiated, unduly repetitive or excessive claims may be subject to a fee.

We make every effort to meet your request. within one month of receipt of the application. This period may be extended by a further two months if necessary, taking into account the complexity and number of applications, in which case we will inform you of any extension and of the reasons for the delay

7. TO WHOM CAN WE DISCLOSE YOUR DATA?

Currently, SanoPass discloses your personal data to:

- service providers (acting either as controllers or as SanoPass processors) and whom SanoPass contacts for administrative, marketing and other service providers (e.g. IT service providers, data storage services, etc.);
- SanoPass partners that you have access to through subscriptions (e.g. Telios Care);
- your employer – in connection with the assessment of your ability to work for purposes related to occupational medicine, but only within the limits of the information established by the legal provisions, being excluded information on the result of the medical investigations carried out;
- other companies with which we can develop joint programs to offer our products and services on the market;
- accountants, auditors, lawyers and other external professional staff, who will be bound by legal or contractual obligations of confidentiality;
- of public authorities, if disclosure is necessary to comply with an obligation under applicable law.

The personal data provided to SanoPass may be transferred outside Romania, to states in the European Union and the Republic of Moldova. For issuing medical subscriptions, SanoPass collaborates with Paynet Services S.R.L. a company registered in the Republic of Moldova, based in MD-2038, bd. Decebal 6, mun. Chisinau (www.paynet.md), accredited to process personal data according to the regulations in force in the country of origin.

8. WHAT SECURITY MEASURES HAVE WE PUT IN PLACE TO PROTECT YOUR DATA?

We take all necessary precautions, taking into account the nature of the personal data and the risks related to the processing of the data, in order to maintain the security of the data and, in particular, to prevent distortion, damage or unauthorized access by third parties (physical protection of the location, authentication procedures with personal access, secured by confidential identifiers and passwords, a login log, encryption or anonymization of personal data, storage in safe environments. However, despite our efforts, we cannot always guarantee the effectiveness of the security measures implemented and therefore we cannot guarantee the security of the data on the personal at all times.

9. UPDATING THE POLICY ON THE PROCESSING OF PERSONAL DATA

This Policy became applicable on October 1, 2020. We may update or amend this Privacy Policy as necessary and will notify you of these changes. However, we recommend that you consult this page from time to time if you want to be informed about how your personal data will be informed. are collected and protected.

To request more details on the measures taken to protect your personal information in the cases mentioned above, you can contact us at any time at dpo@sanopass.ro.