



SIA "Gremošanas slimību centrs "GASTRO"" (Digestive Diseases Centre "GASTRO") Privacy Policy

Personal Data Controller:

SIA "Gremošanas slimību centrs "GASTRO"" (Digestive Diseases Centre "GASTRO")

Reg.No.40003575389

Registered address: Gaiļezera iela 1, Rīga, LV-1079

Website: www.GASTROcentrs.lv

Phone: +371 66901212

E-mail: gastro@gastrocentrs.lv

Patient privacy is crucial for SIA "Gremošanas slimības centrs"GASTRO"" (Digestive Diseases Centre „GASTRO”) therefore, all necessary steps are taken to ensure that patients' personal data is safe. This Privacy Policy is drawn up to make it clear to the patient how exactly SIA "Gremošanas slimības centrs"GASTRO"" (Digestive Diseases Centre „GASTRO”) [hereinafter referred to as "GASTRO"] takes care of the patients' personal data, and to inform the patients about their rights regarding their personal data.

1. Collection and Use of Patients' Data

1.1. Patients' data is collected when a patient contacts GASTRO, uses GASTRO treatment services and visits the website www.gastrocentrs.lv.

1.2. The following data is collected from the patients: name, surname, personal identity number, address, phone number, e-mail address, health-related data; name, surname, personal identity number of the legal representatives of minor patients.

2. Patients' Personal Data Processing Procedures:

2.1. When a patient dials the phone number indicated by the Data Controller, in order to make an appointment with a doctor or to specify the details of the scheduled visit or examination, the content of the communication will be recorded.

2.2. When a patient makes an appointment with a doctor using GASTRO website, the following data is collected: name, phone number.

2.3. When a patient arrives at GASTRO premises, where video surveillance is carried out, their video content can be processed.

2.4. When a patient receives healthcare services, GASTRO, in compliance with the requirements of the regulatory enactments, processes data identifying the data subject (name, surname, personal identity number, phone number, e-mail address), and health-related information proving the diagnosis, examinations, treatment methods and other information, which in a particular situation the relevant healthcare professional will choose to discover and register in the medical records.

3. Grounds for Patients' Data Processing:

3.1. Video surveillance is carried out with the aim of preventing or detecting criminal offences related to property protection, and to control the personnel security. The legal basis is Article 6(1)f of the Regulation.

3.2. Recording of the content of the phone calls is carried out for quality assurance and control, as well as for listening to the record, if necessary, if an uncertainty about the information provided occurs, and the patient has raised objections. The legal basis is Article 6(1)f of the Regulation.

3.3. The patients' data processing, including the processing of sensitive data, for the purpose of providing healthcare services, is carried out on the basis of



requirements of the regulatory enactments, including the Medical Treatment Law, the Law On the Rights of Patients, binding Regulations of the Cabinet of Ministers, as well as Article 9(2)a and Article 9(2)h of the Regulation.

4. Patients' Personal Data is Accessed by:

- 4.1. GASTRO doctors, chief nurse, nurses, medical assistants or other medical records management staff who require patients' data to complete their work functions.
- 4.2. Patient's relatives, loved ones: only upon the patient's consent.
- 4.3. Upon written request and upon receipt of written permission of the head of a medical treatment institution: persons specified in Section 10, Paragraph 5 of the Law on the Rights of Patients.
- 4.4. Personal data processors, in accordance with the service provided, in compliance with the obligations of the personal data processor specified in the General Data Protection Regulation, including the respect for confidentiality.

5. Patient Information on Data Processing:

The Patient is informed about the personal data processing carried out by GASTRO as follows:

- 5.1. A warning sticker regarding the video surveillance is placed in the GASTRO premises. It contains the essential information about the Personal Data Controller and the purpose of the data processing, as well as a note on where other relevant information can be found.
- 5.2. When contacting GASTRO by phone, the data subject is informed about the audio recording in accordance with GASTRO Privacy Policy.
- 5.3. When visiting a website, the data subject is informed about the use of cookies.
- 5.4. When a patient starts receiving a healthcare service, they are informed about their data proceeding.

6. Right to Withdraw the Data Subject's Consent

- 6.1. If the processing of the patient's personal data is initiated and is carried out in accordance with the data subject's consent, the data subject has the right to withdraw it at any time.
- 6.2. The withdrawal of consent does not affect the data processing at the time when the patient's consent was valid.
- 6.3. In the event that the patient withdraws their consent, processing of their personal data shall not be interrupted if it is performed on a different legal basis.

7. Data Storage Period

- 7.1. The storage period for the data processed by GASTRO on the basis of regulatory enactments (patient medical records) is determined in accordance with the regulatory enactments governing the storage of documents.
- 7.2. Video recordings are stored for 30 days.
- 7.3. Recordings of the phone conversations are stored for 6 months.

8. Cookies

- 8.1. Cookie is a text file that is inserted into the browser of the website user's computer to improve the performance of the website.
- 8.2. The website of GASTRO only embeds Google Analytics cookies, which gives GASTRO the ability to keep track of the number of the visitors on the website, their nationality, the browser that the user is using, and the exact pages of the GASTRO website of that have been visited.



8.3. GASTRO does not use cookies to track user habits; therefore, GASTRO informs you about the use of cookies, but does not ask for your consent to embed cookies in compliance with the law. The legal basis for this data processing is the legitimate interest of GASTRO.

9. GASTRO Provides:

- 9.1. lawful and fair personal data processing;
- 9.2. the data processing only for appropriate purposes that have been explicitly explained to the patient;
- 9.3. data minimization (processing only to the extent necessary);
- 9.4. accuracy of data;
- 9.5. data storage for no longer than necessary for processing purposes;
- 9.6. data security and confidentiality.

10. Patient's Rights

- 10.1. The patient as a data subject has the right to receive information about their personal data contained in the GASTRO information systems and to request the correction, discontinuation of processing, or destruction of inaccurate data if they are incomplete, obsolete, unlawfully processed or, if they are no longer necessary for the purpose of their collection.
- 10.2. Such a request must be submitted in writing and submitted to SIA "Gremošanas slimības centrs" GASTRO" (Digestive Diseases Centre „GASTRO”), Gaiļezera iela 1, Rīga, or electronically signed by a secure digital signature to the following e-mail address: gastro@gastrocentrs.lv. The request will be answered not later than within 30 days.
- 10.3. GASTRO draws attention to the fact that personal data stored in accordance with regulatory enactments (accounting, presented invoices, contracts concluded, etc.) can be deleted only in accordance with the requirements of the regulatory enactments.
- 10.4. The patient has the right to report any breach of this Privacy Policy.
- 10.5. In the event that the patient considers that GASTRO has acted unlawfully, the patient has the right to file a complaint with the supervisory authority, which in the Republic of Latvia currently is the Data State Inspectorate, Blaumaņa iela 11/13, Rīga, LV-1011.

11. Patients' personal data will not be transferred outside the borders of the European Union or the European Economic Area.

12. Changes to the Privacy Policy

- 12.1. To improve the quality of data processing, GASTRO can change this Privacy Policy by placing it on this very website. GASTRO recommends that the patient visits this section of the website on a regular basis to find out the latest information.

Rīga, May 25, 2018