

## DATA PROCESSING POLICY

**Hungarian Medical Care & Consult Korlátolt Felelősségű Társaság** (registered seat: 1037 Budapest, Montevideo utca 6. Fsz.; registration number: 01-09-335589; tax number: 26621386-2-41; statistical code: 26621386-8696-113-01) (hereinafter: the “**Clinic**” or the “**Data Controller**”) by creating and making available this data processing policy (hereinafter: the “**Policy**” or „**Notice**”) intends to ensure the realisation of the right to information of data subjects as defined by Regulation (EU) 2016/679 of the European Parliament and of the Council (27 April 2016) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: “**GDPR**”), as well as Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: “**Info Act**”). This Policy shall remain in effect until its withdrawal. The Clinic reserves the right to amend this Policy; notification of any amendment of this Policy shall be communicated by the Clinic by publishing the amended Policy on the website.

This Policy is available on the <https://vface.hu> website and at the Clinic’s registered seat. The Clinic’s activities include, among others: hyaluronic acid fillers; skin rejuvenation treatments; wrinkle removal; non-invasive facelifts; fat dissolving treatments; non-surgical eyelid treatments; axillary hyperhidrosis treatment.

### I. Data Controller

For the purposes of this Policy, the data controller is:

#### **Hungarian Medical Care & Consult Limited Liability Company**

registered seat: 1037 Budapest, Montevideo utca 6.  
Ground Floor  
company registration number: 01-09-335589  
tax number: 26621386-2-41  
statistical code: 26621386-8696-113-01  
e-mail: [vfaceclinic@gmail.com](mailto:vfaceclinic@gmail.com)  
telephone: +36 70 718 8353

### II. Terms referred in this Policy

- **Data Processing:** the performance of technical tasks related to data processing operations.
- **Data Processor:** any natural or legal person or organisation without legal personality which processes personal data on behalf of or under the instruction of the data controller, within the framework and under the conditions specified by law or a binding legal act of the European Union.
- **Data Processing** (as activity): any operation or set of operations performed on data regardless of the method used, including in particular: collection, recording, registration, organisation, storage, alteration, use, retrieval, transfer, disclosure, alignment or combination, restriction, erasure and destruction, as well as the prevention of further use of data, and the making of photographs, audio or video recordings.

- **Data Controller:** any natural or legal person or organisation without legal personality which, independently or jointly with others, determines the purpose of data processing, makes and implements decisions regarding data processing (including the means used), or has them implemented by the data processor, within the framework specified by law or a binding legal act of the European Union.
  
- **Data Transfer:** making data accessible to a specific third party.
  
- **Data Breach:** a breach of data security which results in the accidental or unlawful destruction, loss, alteration, unauthorised transmission or disclosure of, or unauthorised access to, personal data transmitted, stored or otherwise processed.
  
- **Data concerning Health:** personal data relating to the physical or mental health of a natural person, including data relating to the provision of healthcare services to the natural person which reveals information about the natural person's status of health.
  
- **Data Subject:** any natural person identified or identifiable on the basis of any information (a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person), as well as any natural person whose personal data are affected by the data processing.
  
- **Third Party:** any natural or legal person or any other body which is not the Data Subject, the Data Controller, the Data Processor or the persons who, under the direct authority of the Data Controller or Data Processor, are authorised to process personal data.
  
- **Consent:** a voluntary and definite expression of the Data Subject's will, based on appropriate information, by which the Data Subject gives unambiguous consent to the processing of personal data relating to him or her — either in full or limited to specific operations.
  
- **Personal Data:** data relating to an identified or identifiable natural person (data subject) — in particular the data subject's name, identifier, and one or more factors specific to the physical, physiological, mental, economic, cultural or social identity — as well as any conclusion drawn from the data relating to the data subject, which does not qualify as data of public interest or data accessible on public interest grounds.

### III. Data Processing Principles

3.1 The data processing carried out by the Data Controller complies with the data processing principles of the GDPR, which are as follows:

- (a) **Lawfulness, fairness and transparency:** personal data must be processed lawfully, fairly and in a manner that is transparent to the data subject.

- (b) Purpose limitation: personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes.
- (c) Data minimisation: personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- (d) Accuracy: personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- (e) Storage limitation: personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- (f) Integrity and confidentiality: personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- (g) Accountability: The Data Controller is responsible for compliance with the principles and must be able to demonstrate such compliance.

#### **IV. Legal Basis for Data Processing**

##### 4.1 Visiting the website

The provision of personal data is not required to view information published on the Clinic's website at <https://vface.hu>. The Clinic uses Google Analytics cookies to analyse visitor preferences in order to ensure the user-friendly nature of the website, within the framework of which it collects anonymous data for statistical purposes. The Clinic does not collect personal data about website visitors.

Cookies used:

<b>Name</b>	<b>Function</b>	<b>Duration</b>
PHPSESSID	session	until browser is closed
cookiebar	cookie acceptance	12 months
_ga	Google Analytics	2 years
_gid	Google Analytics	24 hours

##### 4.2 Processing of Client's (patient) data

Data processing takes place for the purpose of using the services provided by the Clinic. For this purpose, the following client data must be provided: (1) name (name at birth); (2) residential address (correspondence address); (3) place and date of birth. A valid e-mail address

and telephone number must also be provided for notifications regarding appointment bookings and completed test results. Data processed through the contact form include, among others: (1) name; (2) e-mail address; (3) IP address. The Clinic processes only such personal data that are indispensable for the performance of the service provided by the Clinic, or suitable for achieving the purpose. The Clinic processes personal data to the extent and for the duration necessary to achieve the purpose. The personal data provided by the Client are processed by the Clinic until the performance of the service or until its become impossible to perform, or — except in cases of mandatory data processing — until the time of erasure initiated by the data subject.

Purpose of data processing: the purpose of processing health and personal identification data is to promote the preservation, improvement and maintenance of health, to facilitate the Clinic's effective treatment activities, and to monitor the data subject's state of health (as if necessary).

Legal basis of data processing: the legal basis for data processing is the data subject's consent.

Duration of data processing: the duration of data processing in respect of invoices issued to the client (patient) is 8 (eight) years following the performance of the contract, in accordance with the provisions on the retention of accounting documents under the Accounting Act.

#### 4.3 Processing of business and cooperation partners' data

The Clinic is entitled to process the personal data of its suppliers, business and cooperation partners which related to offers and contracts between the partner and the Clinic, including the conclusion, registration and performance thereof. The scope of data processed includes: data provided in requests for proposals, orders, and contracts, contact information, and data required for the issuance of accounting documents.

Purpose of data processing: the purpose of data processing is exclusively related to the conclusion, performance, amendment or termination of the contract.

Legal basis of data processing: the legal basis for data processing is the data subject's consent and the conclusion of a contract between the partner and the Clinic.

Duration of data processing: the duration of data processing is 8 (eight) years following the performance of the contract, in accordance with the statutory provisions on the retention of accounting documents under the Accounting Act.

### **V. Rights of Data Subjects (patients/clients), data processing**

The Clinic, the Clinic's employees, and any other person in an employment or other legal relationship with the Clinic are bound by an obligation of confidentiality without any time limitation with respect to all data relating to the patient's status of health, as well as any other facts that come to their knowledge in the course of providing services by the Clinic. The Clinic shall be released from the obligation of confidentiality if: (a) the patient or their legal representative has given written consent to the transfer of health and personal identification data, taking into account the limitations contained therein; and (b) the transfer of health and personal identification data is mandatory under the provisions of law.

The patient is entitled to receive information about data processing in connection with the treatment, to access health and personal identification data relating to him or her, to inspect health and other documentation relating to the data subject, and to receive copies thereof (at the patient's own expense).

Personal data may be accessed by the Clinic's employees who have access rights related to the relevant data processing purpose, as well as by persons and organisations performing data processing or outsourced activities for the Clinic on the basis of a contract, within the scope determined by the Clinic and to the extent necessary for the performance of their activities.

The Clinic uses the services of the following data processors in the course of its data processing activities:

**Xinying Zhou**

(e-mail address: [xinyingzhou@gmail.com](mailto:xinyingzhou@gmail.com))

The above entrepreneur provides the Clinic's bookkeeping and payroll services, and thus performs data processing activities in relation to accounting documents issued by the Clinic (and the personal data processed therein), as well as data processed in connection with payroll.

**Gergely Gábor Attila E.V.**

(address: 1131 Budapest, Dolmány utca 11/A.; tax number: 90039720-1-41)

The above entrepreneur performs electronic data processing activities with respect to the development and operation of the Clinic's website.

The Data Processors' activities related to data processing consist of providing the technical background of the development and operation of the Clinic's website and facilitating the fulfilment of the Clinic's bookkeeping-related obligations. The Data Processors may not make substantive decisions affecting data processing, they may only process personal data that comes to their knowledge in accordance with the Data Controller's instructions, they may not carry out data processing for their own purposes, and they are obliged to store and retain personal data in accordance with the Data Controller's instructions.

The Clinic, as data controller, takes all technical and organisational measures for the protection of data and to ensure that processed data are accessed only by authorised persons.

## **VI. Rights related to data processing and their enforcement**

### **6.1 Right to information**

Where the Data Controller processes personal data relating to the Data Subject, the Data Controller is obliged to provide the Data Subject with information — even without a request from the Data Subject — about the most important characteristics of the data processing, including the purpose, legal basis and duration of the data processing, the identity and contact details of the Data Controller, the recipients of the personal data, in the case of data processing based on legitimate interest the Data Controller's legitimate interest, as well as the Data Subject's rights and legal remedies in connection with data processing (including the right to submit a complaint with the supervisory authority), and, where the Data Subject is not the source of the data, the source of the personal data and the categories of personal data concerned, provided the Data Subject does not already have this information. The Data Controller provides this information by making this Policy available to the Data Subject.

The Data Subject is entitled at any time to request information about personal data relating to him or her processed by the Data Controller. The Data Controller shall fulfil the Data Subject's request within a maximum of 30 (thirty) days by electronic or postal letter sent to the contact details provided by the Data Subject. The Data Controller may request the Data Subject to clarify the content of the request and to specify precisely the information requested before fulfilling the request.

## **6.2 Right to rectification**

The Data Subject may request in writing that the Data Controller amend any personal data that is inaccurate, incorrect or incomplete. In such a case, the Data Controller shall correct or rectify the specified personal data without delay, but no later than 5 (five) calendar days, or, if compatible with the purpose of data processing, supplement the data with further personal data provided by the Data Subject or with statements made by the Data Subject regarding the processed personal data. The Data Controller shall notify the Data Subject thereof by electronic or postal letter sent to the contact details provided by the Data Subject.

## **6.3 Right to erasure**

The Data Subject has the right to request the erasure of personal data processed by the Data Controller in writing, and the Data Controller is obliged to erase personal data relating to the Data Subject without undue delay. The Data Controller is obliged to erase the Data Subject's personal data at the Data Subject's request, among other cases, where the personal data are no longer necessary for the purpose for which they were collected or otherwise processed; where the Data Subject withdraws the consent on which the processing is based and there is no other legal ground for the processing; where the personal data have been unlawfully processed; where the Data Subject objects to the processing and there is no overriding legitimate ground for the processing; or where the personal data must be erased for compliance with a legal obligation in European Union or Member State law to which the Data Controller is subject.

The above shall not be applicable, where the processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing under European Union or Member State law to which the Data Controller is subject;
- c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- d) for the establishment, exercise or defence of legal claims.

## **6.4 Right to restriction of processing**

The Data Subject has the right to obtain from the Data Controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the Data Subject, in which case the restriction applies for a period enabling the Data Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims; or

- d) the Data Subject has objected to processing; in this case the restriction applies for the period until it is established whether the legitimate grounds of the Data Controller override those of the Data Subject.

Where processing has been restricted pursuant to the above, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or of a Member State.

The Data Controller shall inform the Data Subject in advance of the lifting of a restriction on processing where processing was restricted at the Data Subject's request pursuant to the above.

### **6.5 Right to data portability**

The Data Subject has the right to receive the personal data relating to him or her in a structured, commonly used and machine-readable format (e.g. doc; pdf; etc.), and has the right to transmit those data to another data controller without hindrance from the Data Controller.

### **6.6 Right to object**

The Data Subject has the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data based on the Data Controller's legitimate interest. In such a case, the Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject, or which relate to the establishment, exercise or defence of legal claims.

### **6.7 Framework for exercising rights**

The Data Controller shall inform the Data Subject of the action taken on a request relating to the rights listed above without undue delay, but in any event within 1 (one) month of receipt of the request. Where necessary, taking into account the complexity and the number of the requests, that period may be extended by a further 2 (two) months. The Data Controller shall inform the Data Subject of any such extension within 1 (one) month of receipt of the request, together with the reasons for the delay. Where the Data Subject makes the request by electronic means, the information shall be provided by electronic means where possible, unless otherwise requested by the Data Subject.

If the Data Controller does not take action on the request of the Data Subject, it shall inform the Data Subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action, and of the possibility of lodging a complaint with the competent data protection supervisory authority.

The above information shall be provided in writing or by other means — including, where appropriate, by electronic means. Oral information may be provided at the Data Subject's request, provided that the identity of the Data Subject has been verified by other means.

If the Data Subject considers that the processing of personal data relating to him or her infringes the provisions of the GDPR, the Data Subject has the right to lodge a complaint with the supervisory authority, which in Hungary is the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11.; tel: +36-1-391-1400; fax: +36-1-391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: <https://www.naih.hu>). The Data Subject has the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning the Data Subject. The Data Subject also has the right to an

effective judicial remedy where the competent supervisory authority does not handle the complaint or does not inform the Data Subject within three months of the procedural developments or outcome of the complaint submitted.

In addition to the above, the Data Subject may initiate proceedings before the competent regional court by way of judicial remedy. Information about the jurisdiction and contact details of the court (regional court) is available on the following website: <https://birosag.hu>.

## **VII. Miscellaneous**

Where the Data Controller intends to carry out further processing of personal data for a purpose other than the purpose set out in this Policy, it shall inform the Data Subject of the new purpose of the processing prior to such further processing. Processing for the new purpose may only commence thereafter — where the legal basis of the processing is consent — if the Data Subject also consents to the processing in addition to the information provided.

This data protection policy shall be valid until its withdrawal.

Budapest, 18 May 2026

**Hungarian Medical Care & Consult Limited Liability Company**