

PRIVACY POLICY

Medicare Egészségközpont Zártkörűen Működő Részvénytársaság
(Medicare Health Care Center Joint Stock Company)

Effective from: 20th June 2026

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This notice outlines the principles governing the processing of personal data by **Medicare Egészségközpont Zártkörűen Működő Részvénytársaság** (Medicare Health Care Center Joint Stock Company, hereinafter: Medicare). Below, you will find information about what personal data Medicare processes, for what purposes and on what legal basis, for how long, as well as who may become aware of and who may access the personal data processed by Medicare. In addition, you will find detailed information below regarding your rights in connection with data processing and how to exercise them.

If you have any questions or comments regarding data processing or the contents of this notice, please send them to data.protection@medicare-group.hu.

Medicare may amend this privacy notice, particularly in the event of the introduction of new data processing activities or changes to existing data processing activities, and will primarily notify its customers and other affected individuals of such changes on its website.

1. How does Medicare process personal data?

Medicare processes information relating to a natural person (e.g., personal identification data, contact information, health data, etc.) —that is, personal data—in accordance with Regulation (EU) 2016/679 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—GDPR), as well as applicable Hungarian data protection laws, as a data controller.

Name:	Medicare Health Care Center Joint Stock Company
Registered office and mailing address:	1134 Budapest, Váci út 29-31.
Email address:	data.protection@medicare-group.hu
Website:	www.medicare-group.hu

The concept of personal data processing encompasses any operation or set of operations performed on personal data, such as recording, storing, accessing, using, disclosing, transferring, deleting, and destroying. Medicare takes the necessary and appropriate measures when processing personal data to prevent unauthorized access to and unauthorized use of such data. In particular, it ensures the physical security of its facilities (e.g., by operating access control and camera systems) and the protection of its electronic systems against unauthorized access (e.g., by using firewalls and secure authentication).

Personal data processed by Medicare may be accessed by its employees and contractors to the extent necessary for them to perform their duties and provide services to you, subject to confidentiality obligations. In addition, Medicare may transfer the data it processes to third parties, such as government agencies, in order to comply with its legal obligations. Data may be transferred for the purpose of providing services to you (e.g., when using an external service provider) and also when Medicare engages a third party—a data processor acting on its behalf and in accordance with its instructions—to perform certain data processing operations (e.g., data storage, organization). In the latter case, Medicare also ensures that personal data is transferred only to a data processor that provides adequate safeguards to ensure the security of the data processing and your personal data.

2. What personal data does Medicare process?

Below you will find general information about Medicare’s data processing activities for various purposes. If you would like to receive personalized information—for example, regarding exactly which recipients Medicare has transferred your personal data to and when—please send your request to data.protection@medicare-group.hu.

A. Data Processing Related to the Provision of Health Care Services and the Performance of Contracts for Health Care Services

Purpose of Data Processing	Provision of healthcare services; conclusion, amendment, and termination of contracts for such services; fulfillment of contractual obligations; enforcement of rights and any claims that may arise; defense against claims; compliance with legal obligations; and maintaining contact.
Legal Basis for Data Processing	Performance of a contract for the provision of healthcare services (GDPR Article 6(1)(b)) Compliance with a legal obligation (GDPR Article 6(1)(c)) Medicare's legitimate interest in enforcing claims (GDPR Article 6(1)(f))
Scope of Personal Data Processed	Medicare processes the following data: - Identifying information (e.g., name, date of birth, mother's maiden name), - Contact information (residential address, mailing address, phone number, email address), - Health data generated in connection with healthcare, as well as the TAJ identification number, - for individuals covered under a group health insurance plan provided by a health insurance provider: place of employment and insurance plan - Job title, religious beliefs, and racial origin, to the extent that such information is relevant to the provision of healthcare services, Some of the above personal data is provided to Medicare by you, as the data subject, in connection with the health care service, or is obtained by Medicare from another health care provider with your consent. Furthermore, in the case of occupational health services, your employer, as a Medicare client, provides Medicare with the identification and contact information necessary for the occupational health examination. If you are covered by a health insurance provider, the health insurer will transmit your personal identification and contact information to Medicare for the purpose of providing health care services. What is health information? Health information includes any data relating to a natural person's physical or mental condition, as well as any data generated in connection with the health care services the person has received regarding their health status.

Data Processing Duration; Deletion	Pursuant to Act XLVII of 1997 on the Processing and Protection of Health and Related Personal Data, Medicare processes and retains all health and personally identifiable data related to health services that form part of health records for 30 years from the date of data collection, and retains the final report for 50 years. Images obtained through diagnostic imaging procedures are processed and retained for 10 years from the date of acquisition. After these periods have elapsed, medical records containing personal data are deleted or destroyed.
Recipients Categories of Recipients, Data Transfer	Medicare transfers personal data to the following recipients: - to its healthcare provider partners, for the purpose of providing healthcare services, delivering care, or fulfilling a contract, including data necessary for such purposes (e.g., conducting laboratory tests, providing emergency care, or delivering certain specialized care); - to authorities specified by law, in order to comply with reporting obligations (e.g., implant in in the case of to Central Implant Registry); - to authorities and courts specified by law, upon their official request or summons, in accordance with the law; - to a data processor providing document archiving and record storage services, pursuant to a data processing agreement ; - to data processors providing server services, pursuant to a data processing agreement; - to companies that deliver mail, acting as data processors, the data necessary for delivery (name and address), pursuant to a data processing agreement.
Consequences of Failure to Provide Data	The provision of data is necessary for the provision of healthcare services and the fulfillment of the contract; therefore, if data is not provided, the service cannot be provided or cannot be provided properly.

B. Data Processing Related to Complaints

Purpose of Data Processing	Handling complaints, investigating the circumstances of the case subject to the complaint, and resolving the complaint.
Legal basis for data processing	Performance of a contract (GDPR Article 6(1)(b)); Compliance with the legal obligation regarding complaint handling set forth in Act CLIV of 1997 on Health Care (GDPR Article 6(1)(c)); Your consent as the data subject, which you provide to Medicare by submitting the complaint, particularly in cases where you did not receive the healthcare service yourself—for example, if a family member did—but you are the one submitting the complaint (Article 6(1)(a) of the GDPR).
Scope of Personal Data Processed	The complainant submitter's provided (typically: name, email address, residential address), as well as the personal data—including, where applicable, health data—contained in the complaint.
Duration deletion ;	Pursuant to Act CLIV of 1997 on Health Care, the duration of data processing is 5 years from the date the complaint is closed, after which the data will be deleted or destroyed.

Categories Categories, Data Transfer	Medicare transfers personal data related to complaints— including, where applicable, health data—to the following recipients: - to healthcare provider partners, regarding the health service ; - to authorities and courts as defined by law, upon their official request or summons, in accordance with the law; - to a data processor providing document archiving and record storage services, pursuant to a data processing agreement ; - to companies providing mail delivery services, acting as data processors, the data necessary for delivery (name and address), pursuant to a data processing agreement. - In the case of a person insured by a health insurance provider, to the insurer or the employer, provided that the complaint was received through one of them and the data subject has consented to the transfer of personal data to the insurer or employer in connection with the handling of the complaint.
Consequences of Failure to Provide Data	All relevant data related to the complaint is necessary for handling the complaint and investigating the circumstances. If data is not provided or is incomplete, the complaint cannot be handled or cannot be handled properly.

C. Recording of Telephone Conversations

Purpose of data processing	The general purpose of recording telephone conversations is to provide evidence of what was said during the conversation. In the case of complaints made by phone, the purpose is to accurately record and document the complaint. Furthermore, the purpose is to provide services, respond appropriately to telephone inquiries, and continuously improve the quality of Medicare's services.
Legal Basis for Data Processing	The legal basis for data processing is your consent as the data subject, which you provide by continuing the call after being notified of the recording (GDPR Article 6(1)(a)). Furthermore, the legal basis is Medicare's legitimate interest in quality assurance and claims processing (GDPR Article 6 (1)(f)).

Data Subject Data	Scope of	The data subject's voice and any personal data spoken during a telephone conversation initiated to and conducted at the number +36 1 465 3100, as well as the date, duration, and calling number of the call.
Duration of data processing; erasure		The duration of data processing corresponds to the statute of limitations (the deadline for asserting claims—5 years from the end of the call; in the case of complaints, from the date the complaint is closed), after which the data will be deleted and destroyed.
Recipients Categories, Data Transfer		Medicare transfers the personal data provided during the telephone conversation to the following recipients: - authorities and courts specified by law, upon their official request or summons, in accordance with the law.
Consequences of Failure to Provide Data		In the case of a complaint made by phone, if data is not provided or is incomplete, the complaint cannot be processed or cannot be processed properly. In other cases, without the provision of personal data, the data subject's request cannot be fulfilled, and no response can be provided to questions concerning the data subject.

D. Data processing related to other inquiries, customer satisfaction surveys, and communication

Purpose of Data Processing	The purpose of data processing is to maintain contact; where applicable, to fulfill a contract entered into with Medicare, to provide services, to collect and evaluate feedback regarding the quality of services provided, and thereby to improve the standard of service. In other cases, the purpose is to respond to reports, inquiries, and questions.
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Legal Basis for Data Processing	For individuals designated as points of contact in the contract by Medicare's contractual partners, the legal basis for data processing is the legitimate interest of Medicare and its contractual partner in the performance of the contract (GDPR Article 6(1)(f)). In the case of reports, inquiries, or questions that do not constitute complaints, your consent as the data subject, which you provide to Medicare by submitting the report, inquiry, or question (GDPR Article 6(1)(a)). When sending a customer satisfaction survey regarding a service already provided by Medicare or requesting an evaluation, the data processing is compatible with the original purpose for which the personal data was originally collected; in such cases, no separate legal basis is required other than the one that permitted the collection of the personal data (processing of personal data for purposes other than the original purpose of collection; further processing).
Scope of Personal Data Concerned	The person designated as the contact person in the contract, as well as anyone who submits a report, inquiry, question, or request to Medicare (either directly or via Medicare's websites medicarekorhaz.hu, medicarediagnosztika.hu, medicareszuleszet.hu, cafeteria.medicare-group.hu, or mysurgeryabroad.com, or via other online platforms, such as Chatbox): - name, - (work) phone number, - (work) email address, - any additional personal data included in the inquiry or report. If you request a customer satisfaction survey regarding a service already provided by Medicare or request an evaluation, your name and email address.

Data retention Duration;	With regard to the personal data of the contractual contact person, data processing continues for the duration of the relevant contract and, following its termination, until the expiration of the statute of limitations (the deadline for asserting claims—5 years). In the case of reports, inquiries, or questions that do not constitute complaints, data processing lasts for 1 year following receipt of the inquiry, after which the data will be deleted or destroyed. In the case of the return of a customer satisfaction survey and the submission of a rating, data is retained for 1 year, after which the data will be deleted or destroyed.
Recipients Categories of Recipients, Data Transfer	Medicare transfers personal data to the following recipients: - authorities and courts specified by law, upon their official request or summons, in accordance with the law; - to its data processor providing document archiving and record storage services, pursuant to a data processing agreement. The creator and editor of the relevant website, acting as Medicare's data processor, may also access the data provided on websites operated by Medicare.
Consequences of Failure to Provide Data	In the absence of contact information, communication becomes impossible.

E. Processing of Job Applicant Data and Data Processing Related to the Recruitment Database

Purpose of data processing	To fill job openings and compile our own recruitment database.
Legal basis for data processing	The legal basis for data processing is your consent as an applicant, which you provide to Medicare by submitting your application (GDPR Article 6(1)(a)). In other cases, the legal basis is Medicare's legitimate interest in filling job openings (GDPR Article 6(1)(f)).

Data Subject Scope of Personal Data	For applicants, data received directly from the applicant or through a job portal: - name; - contact information (phone number, email address); - any personal data that the applicant provides in their resume or in connection with their application. For individuals listed in Medicare's recruitment database: - name; - as well as any personal data that the data subject publishes about themselves on social media sites or job portals (e.g., information regarding education and professional experience).
Data Retention ; Period	In the case of an unsuccessful application, the data will be retained for 2 years following the submission of the application; in the case of individuals listed in the recruitment database, the data will be retained for 2 years following their inclusion in Medicare's own recruitment database. The data will then be deleted or destroyed.
Recipients Data Transfer Categories of	Medicare may transfer the personal data of applicants, as well as the data of individuals listed in its own recruitment database, to its subsidiaries.
Consequences of Failure to Provide Data	In the case of applicants, incomplete data submission prevents the application from being evaluated successfully.

F. Newsletter Service and Direct Marketing Inquiries

Purpose of data processing	Direct marketing, promoting Medicare's services, and encouraging the use of its services.
Legal basis for data processing	Your consent as the data subject, as well as Medicare's legitimate interest in direct marketing.
Scope of Personal Data Processed	The following data provided by you, as the data subject: - name, - email address.

Data processing Deletion	Duration;	Medicare processes personal data until an objection to data processing is raised or consent is withdrawn.
Categories Data Transfer	Categories,	Medicare transfers personal data exclusively to authorities and courts specified by law, upon their official request or summons, in accordance with the law.
Consequences of Failure to Provide Data		If data is not provided, the newsletter service cannot be provided.

G. Data Processing Related to the Operation of an Electronic Security System

Purpose of Data Processing		For property protection purposes, Medicare processes data at the Medicare Hospital (1134 Budapest, Váci út 2931), the Medicare Eiffel Clinic (1062 Budapest, Teréz krt. 55-57), and the Medicare Clinic – Szeged (6723 Szeged, Felső Tisza-Part 25) for property protection purposes. No cameras have been installed in examination and consultation rooms or patient rooms.
Legal Basis for Data Processing		The legal basis for data processing is the data subject's consent, which is given upon entering the rooms monitored by cameras, as well as Medicare's legitimate interest in property protection.
Scope of Personal Data Processed		In this context, the personal data processed by Medicare consists of video recordings of the data subject, the data subject's behavior as seen in the recordings, and the time the recording was made.
Data processing Deletion	Duration;	Medicare deletes the recordings three business days after they are made, unless they are required for official or judicial purposes, in accordance with Act CXXXIII of 2005 on the Rules Governing Personal and Property Protection and Private Investigation Activities.
Recipients Data Transfer	Categories,	Medicare transmits camera recordings exclusively to authorities and courts specified by law, upon their official request or summons, in accordance with the law.

Consequences of Failure to Provide Data	If data is not provided, services cannot be provided at healthcare facilities where cameras have been installed.
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Medicare stores the recordings exclusively on its own servers located in a secure, locked facility, under enhanced data security measures. Unauthorized persons may not access the recordings; access is limited to authorized Medicare employees, contractors, and data processors performing security duties (under a data processing agreement), to the extent necessary for them to perform their duties. As a data subject, you may request that Medicare not destroy the recordings until a court or authority issues a request, but for no longer than 30 days, if this is necessary to assert your rights or legitimate interests (e.g., to investigate the circumstances of a potential criminal offense). As the data subject, you may only request a copy of a recording in which no other person appears or is recognizable.

H. Data Processing Related to Profiles Created on Social Media Sites

Purpose of data processing	To operate and moderate Medicare's social media profiles (Facebook, LinkedIn), to promote Medicare's services, and to continuously improve Medicare's services through the analysis of traffic data.
Legal basis for data processing	The legal basis for data processing is, on the one hand, your consent as the data subject, which you provide, for example, by accessing the page, posting a review, or commenting on Medicare's posts (GDPR Article 6(1)(a)). On the other hand, it is based on Medicare's legitimate interest in the proper operation and moderation of its social media profile (e.g., regarding the deletion of offensive comments; Article 6(1)(f) of the GDPR).
Scope of Personal Data Processed	Name, and any personal data that the data subject provides on the social media site and in connection with Medicare's social media profile in connection in connection with or in their comments.
Duration ; Deletion	Personal data (including comments) will be deleted no later than 5 years (general statute of limitations) after accessing the site or posting a comment.
Categories ; Data Transfer	Medicare does not disclose to anyone any data it obtains in connection with the operation of its profile pages on social media sites.

Consequences of Failure to Provide Data	Failure to failure failure does not entail any consequences.
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I. Data processing related to the provision of healthcare services via telemedicine and the performance of contracts for healthcare services provided via telemedicine

Purpose of data processing	Provision of healthcare services via telemedicine; conclusion, amendment, and termination of contracts for such services; fulfillment of contractual obligations; enforcement of rights and any claims that may arise ;
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	defense against claims; compliance with legal obligations; and maintaining contact.
Legal Basis for Data Processing	Performance of a contract for the provision of healthcare via telemedicine (GDPR Article 6(1)(b)) Compliance with a legal obligation (GDPR Article 6(1)(c)) Medicare's legitimate interest in enforcing claims (GDPR Article 6(1)(f))

Scope of Personal Data Processed	Medicare processes the following data: - Identifying information (e.g., name, date of birth, mother's maiden name), - Contact information (residential address, mailing address, phone number, email address), - Health data generated in connection with healthcare, as well as the TAJ identification number, - for individuals covered under a group health insurance plan provided by a health insurance provider: place of employment and insurance package - Job title, religious beliefs, and racial origin, to the extent that they are relevant to the provision of healthcare services, - photographs of the data subject, audio and video recordings of the data subject, and the data subject's behavior as seen in such recordings. Some of the above personal data is provided by you, as the data subject, to Medicare in connection with the healthcare service received via telemedicine, or Medicare obtains it from another healthcare provider with your consent. If you are insured by a health insurance provider, the health insurer will transmit your identification and contact information to Medicare for the purpose of providing healthcare services. <u>What is health information?</u> <u>Health data</u> includes any data relating to a natural person's physical or mental condition, as well as any data generated in connection with the health services the person has received regarding their health status.
Duration of data processing; Deletion	Pursuant to Act XLVII of 1997 on the Processing and Protection of Health and Related Personal Data, Medicare processes and retains all health and personally identifiable data related to health care services that form part of health records for 30 years from the date of data collection, and the final report for 50 years. Photographs of the data subject, audio and video recordings of the data subject, and the data subject's behavior as seen in the recording: exclusively during the telemedicine consultation. Audio and video recordings are not made.

Recipients Data Transfer	Categories of	Medicare transfers personal data to the following recipients: - to its healthcare provider partners, for the purpose of providing healthcare services via telemedicine and fulfilling contractual obligations, including data necessary for such services (e.g., conducting laboratory tests, providing emergency care, or certain specialized treatments); - to authorities specified by law, for the purpose of fulfilling reporting obligations; - to authorities and courts specified by law, upon their official request or summons, in accordance with the law; - to its data processor providing document archiving and record storage services, pursuant to a data processing agreement; - to data processors providing server services, pursuant to a data processing agreement; - to companies that deliver mail, acting as data processors, the data necessary for delivery (name and address), pursuant to a data processing agreement.
Consequences of Failure to Provide Data		The provision of data is necessary for the delivery of healthcare services via telemedicine and for the fulfillment of the contract; therefore, if data is not provided, the service cannot be provided or cannot be provided properly.

J. Data Processing Related to Payments Made Through the Online Appointment Scheduling System

Purpose of data processing	To settle the payment for the ordered service (fulfillment of a contractual obligation).
Legal basis for data processing	Performance of a contract, pursuant to Article 6(1)(b) of the GDPR.
Scope of personal data processed	Name, billing address (name, country, ZIP code, city, street name, house number, floor, apartment number), phone number, email address, transaction amount, IP address, date and time of the transaction.
Data processing Deletion	Duration; Deletion takes place after the expiration of the general statute of limitations under the Civil Code; the statute of limitations begins on the date the contract is concluded.

Recipients data transfer	categories,	As the provider of the SimplePay service, OTP Mobil Kft. (headquarters: 1138 Budapest, Váci út 135-139. B./5.; company registration number: 01-09-174466; tax ID number: 24386106-2-44), the privacy policy is available at the following link: https://simplepay.hu/adatkezelesitajekoztatok/ .
Consequences of Failure to Provide Data		Without providing personal data, it is not possible to pay the service fee electronically via credit card in the Online Appointment Scheduling System.

K. Data Processing Related to Your Medicare Account in the Online Appointment Scheduling System

Purpose of Data Processing		Registration required to create the customer's Medicare Account; customer identification required to use the Medicare Account; ensuring access to the process for initiating the conclusion of an individual insurance contract with Medicare Biztosító Zrt. at ; and verification of consent.
Legal basis for data processing		The customer's consent, which is provided to Medicare by completing the registration process to create a Medicare Account at (Article 6(1)(a) of the GDPR).
Scope of Personal Data Processed		For natural persons without an MRN number: name, mother's maiden name, place and date of birth, gender, nationality, language, address, TAJ number, email address, phone number, and password. For customers without a TAJ number—in addition to the information provided as the reason for the absence of a TAJ number—one of the following pieces of data will be processed: passport number, residence permit number, European Health Insurance Card number, PID identifier, national ID card number, residence permit number, or tax identification number. For natural persons with an MRN number: MRN identifier, date of birth, email address, password.
Data Processing Deletion	Duration;	After the Medicare Account is closed, Medicare retains password data for up to six months, after which it is deleted. With regard to the duration of processing the customer's other personal data in connection with the use of healthcare services, the provisions set forth in Section A apply.
Recipients Data Transfer	Categories of	Medicare transfers personal data to the following recipients: - authorities and courts specified by law, upon their official request or summons, in accordance with the law; - to its data processor providing server services, pursuant to a data processing agreement; - to Medicare Biztosító Zrt. in its capacity as an insurance broker, in the event of an application to enter into an individual insurance contract.

Consequences of Failure to Provide Data	If you fail to provide the required information, you will not be able to register for a Medicare Account or use the features available through it.
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3. What should you know about cookies?

A. What are cookies?

A cookie is a small data file or set of data that is stored on your device (computer, phone, or tablet) when you visit or browse a website.

Cookies can serve many different purposes. Most commonly, they collect data about the use and traffic of the visited website to enhance the user experience and to display targeted advertisements.

Cookies cannot be used to personally identify a website visitor; they are used solely to recognize the visitor's device (computer, phone, or tablet). They also cannot be used to run programs or viruses.

B. For what purposes and what types of cookies do websites operated by Medicare use?

Medicare uses cookies on the following websites it operates:

- medicare-group.hu
- medicarediagnosztika.hu
- medicarekorhaz.hu
- medicareszuleszet.hu
- hirek.medicare-group.hu
- cafeteria.medicare-group.hu
- mysurgeryabroad.com, as well as

Medicare uses the following third-party cookies on the websites listed above—that is, cookies created not by Medicare but by an external service provider.

Cookie	Cookie Function and Data Collected by the Cookie
Google AdWords cookies	These cookies collect data about visits to Medicare's websites (e.g., subpages visited). They are used for remarketing purposes, meaning they enable targeted Medicare ads to appear on other websites based on your visits to Medicare's websites.

Google Analytics cookies	These cookies collect statistical data about visits to Medicare websites (e.g., pages viewed, number of visitors, approximate geographic location, etc.) to analyze website usage and traffic. Medicare uses the statistical data it receives through the Google Analytics service regarding traffic and usage on its websites to improve its websites.
Facebook Cookies	These cookies also collect data on the use of Medicare websites (e.g., pages viewed) so that
	can display targeted Medicare ads to you on its platform.

You can find more information about the cookies mentioned above on the following websites:

<https://policies.google.com/technologies/types>

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

<https://www.facebook.com/help/cookies/>

C. How long are cookies stored, and how can they be deleted?

The cookies listed above are placed on the device you use to browse the Medicare websites with your permission—that is, with your consent—when you visit them. Their lifespan varies, but they are automatically deleted no later than 2 years after they are placed. However, you can delete cookies at any time or configure your browser to block cookies. The links below provide information on how to delete or block cookies in the most commonly used browsers:

[Google Chrome](#)

[Firefox](#)

[Microsoft Internet Explorer](#)

However, if you disable cookies, Medicare websites may not function as intended or optimally in your browser.

4. What rights do you have regarding the processing of your personal data?

You have the right to:

- to receive information, access your personal data, and request a copy
- to have your personal data corrected,
- to withdraw your consent to data processing, to have your personal data erased, i.e., the “right to be forgotten,”
- to object to the processing of your personal data,
- to restrict data processing,
- to data portability, and - to seek legal remedies.

A. Right to Information

In addition to the information detailed in Section 2, you may contact Medicare using the contact information provided in Section 1 to request specific information regarding whether Medicare is processing your personal data; if so, what data is being processed, for what purpose and on what legal basis, and for how long; and you may also request information on how your personal data was obtained by Medicare, whether it was disclosed or made available to third parties, and if so, to whom, when, and for what purpose, as well as information regarding your specific rights related to data processing. Medicare provides this information free of charge; however, in the case of a request that is clearly unfounded or—particularly due to its repetitive nature— excessive, Medicare may, in accordance with the relevant legislation, charge a reasonable fee (proportionate to administrative costs) or may decline to fulfill the request for information.

You may request a copy of your processed personal data, in electronic or other (particularly paper) format, for which—exercising the option provided by applicable law—Medicare may charge a reasonable fee (proportionate to administrative costs).

Medicare will fulfill your request for information while respecting the rights of others (in particular, the right to the protection of trade secrets and intellectual property).

B. Right to Correction

If you become aware that any of your personal data processed by Medicare and stored in its systems (including, in particular, contact information, email address, phone number) is incorrect (e.g., due to a typo) or incomplete, Medicare will, upon your request sent to the contact information provided in Section 1, complete any incomplete personal data or correct any incorrect personal data in its systems. Furthermore, Medicare will also notify any third parties to whom your personal data has been disclosed of the correction, unless this is impossible or would require a disproportionate effort.

C. Data Processing Given withdrawal ; Right to erasure, “right to be forgotten”

You have the right to withdraw your consent to data processing at any time; however, this does not affect the lawfulness of data processing prior to the withdrawal.

If you withdraw your consent to data processing and

- there is no other legal basis for the data processing, or
- if the purpose of the data processing has ceased to exist, or
- the data processing is unlawful, or
- the data must be deleted pursuant to law, then, upon your request sent to the contact information provided in Section 1, Medicare will permanently delete your personal data and any copies thereof from its systems or destroy them. Furthermore, Medicare will also notify any third parties to whom your personal data has been disclosed of the deletion, unless this is impossible or would require a disproportionate effort.

D. Right to Object

If the processing of your personal data is based on the legitimate interests of Medicare or a third party, you have the right to object to such processing by contacting us using the contact information provided in Section 1. In such cases, Medicare will no longer process your personal data, unless there are compelling legitimate grounds for the processing that override your interests.

E. Restriction of Data Processing

You may request the restriction of data processing regarding your personal data using the contact information provided in Section 1; in such cases, Medicare may only store your personal data without using it or performing any further data processing operations (e.g., transfer, deletion); such operations may only take place during the restriction period if you consent to them or if they are necessary for the establishment, exercise, or defense of legal claims, or for the protection of the rights of a third party, or for the protection of an important public interest of the Union or of a Member State. Furthermore, Medicare will also inform any third parties to whom it has disclosed your personal data of the restriction, unless this is impossible or would require a disproportionate effort.

You may request a restriction on the processing of your data

- if you believe your data is inaccurate and do not want Medicare to use it until it is corrected, or
- if you believe the processing is unlawful, or
- the purpose of Medicare's data processing has ceased, but you do not want your data to be deleted because you need it, for example, to assert, defend, or enforce a legal claim.

You may also request restriction at the same time as you object to data processing based on the legitimate interests of Medicare or a third party; in such cases, the restriction will last no longer than the time required to decide on your objection.

F. Data Portability

If the data processing is based on your consent, is necessary for the performance of a contract with you, or is carried out by automated means, you may request, using the contact information provided in Section 1, the transfer of only the personal data concerning you that you have provided to Medicare, in a structured, commonly used, machine-readable format to yourself or to another data controller designated by you; in the case of health data, this is subject to a waiver of medical confidentiality. Medicare will fulfill your request while respecting the rights of others (in particular, the right to protection of trade secrets and intellectual property).

5. How can you exercise your rights regarding data processing?

You may submit your request or inquiry regarding the exercise of your rights related to the data processing detailed above using the contact information provided in Section 1. Please include at least two pieces of personal information in your request to so that Medicare can identify you (e.g., name and phone number, or name and email address). You may also submit your request or comment verbally by calling the phone number listed in Section 1; however, Medicare will always respond and provide information in writing (primarily in the format of your choice; if no format is specified, Medicare will determine the format—either electronically via email or on paper via mail). Please indicate in your written request (submitted via email or on paper) the format in which you would like to receive a response (e.g., electronically via email or on paper by mail); otherwise, Medicare will send you the response in the format corresponding to your request. Medicare will provide a substantive response to your request or inquiry regarding data processing

within 30 days of receipt; in exceptional cases (e.g., due to the complexity of the request), within 60 days. In the latter case, Medicare will notify you separately of the extension of the response deadline and the reasons for it within 1 month of receiving your request.

A. I am not yet of legal age; what should I do?

If you have not yet turned 16, you may exercise the rights detailed above with the consent of your legal representative—most often, the parent who has parental custody. If you are at least 16 years old but not yet 18, you may independently give consent to data processing; however, you may exercise the rights detailed above only with the consent of your legal representative— which is most often the parent exercising parental authority.

B. What rights can be exercised regarding the personal data of a deceased relative?

For a period of 5 years following the data subject's death, the person authorized by the data subject during their lifetime in a public document or a private document with full probative force is entitled to exercise the rights to access, rectification, erasure, objection, and restriction of processing with respect to the data subject's personal data. If the data subject did not authorize anyone during his or her lifetime, then for 5 years following his or her death, a close relative (the spouse, lineal relative, adopted child, stepchild, foster child, adoptive parent, stepparent, foster parent, or sibling—whichever close relative acts first) is entitled to exercise the rights to rectification and objection, furthermore, if the data processing was unlawful even during the data subject's lifetime, or if the purpose of the data processing ceased upon the data subject's death, they may also exercise the right to erasure and the right to restrict data processing. Medicare will respond to inquiries or requests regarding the personal data of a deceased person from an authorized party within 25 days of receipt.

6. What remedies are available? – Data Protection Officer, supervisory authority, court

For all questions regarding data processing and the exercise of the rights detailed above, as well as regarding Medicare's responses to data processing requests and inquiries, you may contact the Medicare Data Protection Officer at the following contact information:

The data protection officer of Medicare	
Name:	Ildikó Salamon
Email address:	dpo@medicare-group.hu
Mailing Address:	1134 Budapest, Váci út 29-31.

If you have a complaint regarding Medicare's data processing, you may file it with the data protection supervisory authority, namely Nemzeti Adatvédelmi és Információszabadság Hatóság

(Hungarian National Authority for Data Protection and Freedom of Information), using the contact information below:

Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information)	
Headquarters:	1055 Budapest, 9–11 Falk Miksa Street
Mailing address:	1363 Budapest, P.O. Box 9
Email address:	ugyfelszolgalat@naih.hu
Phone number:	+36 (1) 391-1400
Website:	http://naih.hu

In addition to the above, you may also file a lawsuit to enforce your rights and claims regarding data processing. You may initiate legal proceedings before the court with jurisdiction over your place of residence or current location.

Budapest, 20th July 2026

Medicare