



Information on the EU Regulation 2016/679, 27 April 2016, with regards to the Personal Data of individuals and the protection and processing thereof. It also expresses the commitment undertaken by the HPA Health Group regarding privacy and Personal Data protection of its patients.

The HPA Health Group manages its patients Personal Data on a contractual and pre-contractual basis and all recorded information serve the purpose of providing medical care. Recording patients' medical records is an integral part of reaching a medical diagnosis and providing treatment, for social purposes, preventative medicine and workplace medicine as well as financial management.

Personal Data is obtained directly from the patient, with the completion of an Identification Form, or when booking an appointment / exam either by email or one of our digital platforms (HPA App or Website). In addition to the information provided by the patient, personal data is obtained and recorded during the course of the established relationship, particularly when providing medical care.

Only strictly necessary information is requested and only for the purpose that it is intended. Apart from the required information provided, omission of other relevant medical information may affect or compromise the quality of medical care provided.

In the case of minors or patients incapable of providing the necessary information, the legal representative must exercise this right.

Patient's Personal Data is collected for the following purposes:

- Patient Identification;
- Patient communication, including information notices on booking appointments or responding to suggestions, complaints and requests for information;
- Obtaining medical diagnoses and providing medical care;
- Invoicing purposes;
- Internal organization and management, such as accounting, service planning, audits, certifications and accreditations considered relevant for quality control and promoting the services we provided, in the terms which are legally permitted by law;
- Compliance with legally binding obligations, namely requests from legal authorities and other public entities;
- Statistical studies and clinical research, where images are provided anonymously.

In some of our Hospitals / Clinics and in specific areas, video images are collected for surveillance and security purposes. Cameras are visibly identified in each location.

Patients' personal and medical records are handled by professionals, who are subject to a confidentiality act with limited access to what is strictly necessary in providing medical care. To provide the best care possible, various teams of health professionals may work together on the information obtained.

If the patients has a health insurance cover Personal Data, including medical records, can be provided to the respective health insurance company. If this involves an insurance company with headquartered outside the European Economic Area, we ensure that measures are taken to avoid disrupting the protection of Personal Data.

When requested and subject to the patient's consent, we can provide the said patient's medical information to another health care provider or other entity and provide access to a family member depending on existing legal conditions.



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INFORMATION ON PRIVACY

HPA Health Group uses subcontractors to provide certain services, such as computer support providers, medical equipment providers, consultants, auditors, legal services providers who may have access to patients' Personal Data.

In compliance with legal obligations, or in defense of vital interests, patient's information may also be transmitted to a third party. These are paradigmatic situations, on request from a public authority, such as judicial entities or controlling authorities and obligatory notifications for reasons of public interest and health.

Patient's Personal records will be kept for as long as they are necessary for medical purposes, or for the length of time which is mandatory and imposed on hospitals under current legislation.

The Health Unit which is treating the patient is responsible for the patient's Personal Data.

For organizational reasons and for the patient's convenience the HPA Health Group has an Integrated Information System where it is possible to access patients' medical records from any unit of the HPA Health Group, without affecting the confidentiality of the said records. The Group of companies and the joint confidentiality responsibilities involved, can be consulted on website: www.grupohpa.com. HPA » Personal Data Protection).

Under current legislation, the patient is entitled to access and rectify his Personal Data, as well as to request its withdrawal or limit its access, to refuse its use and request its portability. The patient is entitled to lodge a complaint with the National Data Protection Commission, if it is considered that current Personal Data legislation is being violated.

For information regarding Personal Data, please contact our Data Protection Officer at dpo@grupohpa.com and/or info@grupohpa.com, or in writing to your hospital or clinic.

**The information contained in this document may need to be revised at any time. The latest version is always available on our website, www.grupohpa.com (HPA » Personal Data Protection), and we recommend that it is consulted period*