



This clarification is for the purpose of compliance with Regulation (EU) 2016/679, of 27 April 2016, regarding individual data processing protection. It also expresses the commitment undertaken by the HPA Health Group in regard to defending the privacy and personal data protection of its clients.

The HPA Health Group treats your personal data in the context of managing the contractual relationship and pre-contractual records that serve as a base for providing health care. Collecting and storing health records is an integral part of carrying out medical diagnostics, providing care or health treatment or a social act, and preventative or workplace medicine, as well as in the management of health services.

We obtain personal data in person, when you fill out a form (e.g. "identification of client"), book or have a consultation/exam, or remotely through our digital platforms (HPA app and website) or send an e-mail. In addition to what is supplied to us directly, we store personal data obtained in the course of established relations, particularly when providing care.

We only request information strictly necessary for the intended purpose. Apart from the required information, the omission of other required information can affect or compromise the quality of the services provided.

In the case of minor clients or those incapable of completing the forms, their respective legal representatives must show proof of this right.

In order to properly fulfil our duty, we will process your personal data for the following purposes:

- Identification as a client;
- Communication and contact, including sending notices of booking appointments or responding to suggestions, complaints and requests for information;
- Effecting clinical diagnoses and providing integrated health care;
- Invoicing services provided;
- Internal organisation and management, namely accounting, service planning, audits, certifications and accreditations considered relevant for the control and promotion of the quality of the services provided, in the terms permitted by law;
- Compliance with binding obligations, namely of communication with authorities and other public entities;
- Undertaking of statistical studies and clinical research, after being anonymised.

In certain units and specific locations, for the purpose of the safety of people and goods, we collect images through videosurveillance. The operation of the cameras is duly indicated in a visible location.

The information related to your health is processed by professionals, who are subject to the obligation of discretion or confidentiality and only as necessary for providing health care. In order to provide the best care, the health professionals can work together on the information obtained.

If you wish to have the health care service submitted to an insurance policy or health subsystem, your personal data, including information on your health, it can be communicated to the respective entity. In this case, if it involves an insurance company headquartered outside the European Economic Area, we ensure that proper measures are taken in order to avoid disrupting the protection of personal data.



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INFORMATION ON PRIVACY

If requested, we can transmit health information to other health care providers or referencing entities, with access by family members subject to your consent and any other applicable legal terms.

In order to provide certain services, HPA Health uses processors entities, which can have access to your personal data in contractually established terms, namely healthcare providers, companies supplying IT support, suppliers of medical equipment, consultants, auditors and legal service providers.

In compliance with legal obligations, or in defence of vital interests, your information can also be transmitted to third parties. These are paradigmatic situations, the execution of orders from public authorities, such as judicial entities or controlling authorities and obligatory notifications for reasons of public interest and health.

Personal data is only stored as long as necessary for the purpose for which it was collected, remaining further than this for obligatory legal deadlines. Keeping information collected in the ambit of providing care respects the regulations and deadlines of the legislation applicable to hospital documentation.

The main responsibility for processing personal data lies with the Health Unit providing the care. For reasons of internal organisation and for your convenience, the companies that are part of the HPA Health Group have an Integrated Information System, so that your information can be made available in another unit of the HPA Health Group, should it be necessary, without affecting the degree of guaranteed confidentiality. The companies and joint responsibilities can be consulted on our website, www.grupohpacom (HPA » Protection of Personal Data).

In the terms of applicable legislation, you have the right to access and rectify your personal data, as well as request that it be deleted (“right to be forgotten”) or limited, to oppose the processing and manage the portability. You also have the right to complain to the National Commission for Data Protection, in the capacity of control authority, if you believe that the processing of your personal data violates the applicable legislation.

In exercising your rights to request information regarding your personal data, please contact our Data Protection Officer at dpo@grupohpa.com and/or info@grupohpa.com, or contact your hospital or clinic in writing.

**The information contained in this document can be revised at any time. The latest version is always available on our site, www.grupohpa.com (HPA » Protection of Personal Data), and we recommend that you consult it periodically.*