



Information on processing of personal data

I. Data controller

The data controller of the personal data of persons examined with the Braster Pro medical device ("Patient") is Braster S.A. with its registered office in Szeligi (05-850), ul. Cichy Ogród 7, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for Warsaw in Warsaw, 14th Commercial Division of the National Court Register under KRS number: 0000405201, NIP (Tax Identification Number): 5213496648, REGON (National Business Registry Number): 141530941, share capital in the amount of PLN 916,857.40 (hereinafter: "Controller").

In matters relating to personal data processing, the Data Protection Officer is available at the following e-mail address: daneosobowe@braster.eu or can be reached by mail sent to the address of the Controller.

II. Data Processing

1. The Controller processes the Patient's personal data (hereinafter: "Data"), which are necessary to provide the service of performing an evaluation of a thermogram by a certified specialist cooperating with the Controller and having the necessary expertise in the field of contact thermography. The purpose of the evaluation is to verify whether the results of the examination performed by an entity using the Controller's device (e.g. a medical facility) are correct.
2. Patient Data is disclosed to the Controller by the entity (e.g. a medical facility) performing the examination of the Patient with the use of the Controller's devices. Failure to disclose Patient Data prevents the performance of the evaluation referred to in item 1 above.
3. Patient Data disclosed to the Controller and processed by the Controller include the following categories in particular: Last name and first name(s), date of birth, designation of gender, address, PESEL number/type and number of identification document, description of patient's health status or health care services provided to the patient.
4. The Controller provides protection of Data from access by unauthorized persons, its takeover by an unauthorized person and processing in violation of the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 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 (hereinafter: "GDPR"). For this purpose the Controller applies organizational and technical measures in accordance with applicable standards.

III. Purposes of Data processing

The Controller collects Patient Data for the following purposes:

- provision of telemedicine services pursuant to art. 6 (1) (b) in connection with art. 9 (2) (h) of GDPR, in particular, provision of services of thermogram analysis and sharing its results with the Patient;
- keeping medical records based on art. 9 (2) (h) of GDPR in connection with art. 24 (1) of the Act of 6 November 2008 on patient's rights and Patient's Rights Ombudsman ("Act on patient's rights") and the ordinance by the Minister of Health of 9 November 2015 on types, scope and templates of medical records and the manner of their processing ("Ordinance of Min. of Health");
- enjoyment of rights by the Patient as a user of a medical device, in particular in receiving and archiving declarations on authorizing other persons to access Patient's records and informing them about the Patient's health pursuant to art. 6 (1) (c) of GDPR in connection with art. 9 (3) and art. 26 (1) of the Act on patient's rights and par. 8 (1) of the Ordinance of the Min. of Health;
- pursuing potential claims based on business activity pursuant to art. 6 (1) (b) and (f) of GDPR, as the so-called legitimate interest of the Controller understood as pursuit of potential claims and defense of his rights.
- keeping accounting records by the Controller and complying with provisions of the tax law, including the issuance of invoices for devices sold pursuant to art. 6 (1) (c) of GDPR in connection with art. 74 (2) of the Act on accounting of 29 September 1994.



IV. Period of Data Retention

Medical records of the Patient containing the Data shall be retained for at least 20 years from the day on which the last data entry was made. The data processed in order to pursue potential claims are stored for the period of limitation of claims pursuant to provisions of the Civil Code. The Controller processes personal data for accounting and tax purposes for 5 years, starting from the end of the calendar year during which the tax obligation arose (tax point). The remaining data is stored for the time necessary for the Controller to undertake necessary action, unless the applicable legislation states otherwise. After the above-mentioned periods the Patient's data are deleted or anonymized.

V. Patient's Rights

1. The Patient has the right to access and correct the Data. The Patient has the right to object to the processing of Data.
2. In legally justified cases, the Controller allows the Patient to delete her Data. The Controller may refuse to delete the Data, if the Controller is allowed or obliged to do so by provisions of generally applicable laws, in particular, provisions concerning the maintenance of medical records.
3. To exercise her rights, the Patient should contact the Controller, using the following email address: daneosobowe@braster.eu or contact the Controller by mail, using the Controller's address.
4. The Patient may request that her Data be transferred to another data controller.
5. The Patient has the right to lodge a complaint with the body providing supervision of compliance with personal data protection regulations - the President of the Personal Data Protection Office.

VI. Entrusting and Sharing Personal Data

Patients' personal data may be received by appropriate state authorities operating on the basis of generally applicable legal provisions. In addition, Patients' personal data may be transferred to entities processing personal data at the request of the Controller, such as providers of IT services, in which case such entities shall process personal data on the basis of an agreement with the Controller and exclusively in accordance with the Controller's instructions. In addition, Patients' personal data will be processed by authorized employees/associates of the Controller.

Braster S.A.

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