

Contents

1. Provider of the teledermatology application AIPDerm and name of the data controller:	3
2. General Provisions:	4
If you'd like to know more about how we process personal data in accordance with Article 13 of the GDPR, please go to menu item 3.....	4
A) Basic concepts of data protection:	4
B) Our data management principles:.....	5
C) Enhanced technical and organizational measures applied regarding health record management and the use of artificial intelligence (AI)	5
D) Presentation of the AIP teledermatology service.....	7
3. Details of certain data processing operations:	8
A) Data processing directly related to the teledermatology service AIPDerm:	8
I. Register for the AIPDerm teledermatology service	8
II. Data processing related to the AIPDerm user account	9
III. Data processing associated with an artificial intelligence (AI) prediagnostic decision support system as part of the AIPDerm teledermatology service.	11
IV. Processing based on a legal obligation in relation to the provision of the teledermatology health service AIPDerm	13
I. Data processing related to invoicing, tax and accounting obligations and settlement of accounts in connection with contracts with the data controller.	16
II. Data processing related to newsletters.....	18
III. Handling complaints, and data processing related to the non-performance of the contract	19
IV. Data management related to the processing of contact details.....	21
V. Data management related to quality control and customer satisfaction management:.....	22

VI. Development of AIPDerm technology based on artificial intelligence	23
VII. Psycho-dermatological surveys	24
4. Cookies and related technologies	24
5. Data transfers outside the EU/EEA	24
6. Links to other websites	26
7. Changes and availability of the guidelines.....	26

Privacy Policy

AIPDerm, the provider of the teledermatology application, is committed to the lawful processing and protection of personal data. This Privacy Policy provides information about the purposes for which, the legal basis on which and the way in which we process your personal data, your rights of access to data, and any other relevant circumstances in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council ("**GDPR**") and related Hungarian sectoral legislation, in particular Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information, and any other relevant circumstances.

1. Provider of the teledermatology application AIPDerm and name of the data controller:

Name of the data controller/provider:

AIP Hungary Korlátolt Felelősségű Társaság

- Incorporation No.:

01-09-388612

- principal office:

1123 Budapest, Táltos street 15. B building 2. floor 1. door

- e-mail adress:

privacy@aip.ai

- Phone number:

+36 1 443 3033

The Data Controller has appointed a Data Protection Officer, who continuously monitors and controls the lawfulness of data processing and also serves as a point of contact for data subjects and the supervisory authority, the National Authority for Data Protection and Freedom of Information ("NAIH"), through its operational staff.

Name of the Data Protection Officer appointed by the Data Controller:

Dr. Hegedűs Arnó

- Adress:

1123 Budapest, Táltos street 15. B building 2. floor 1. door

- e-mail adress:

privacy@aip.ai

- Phone number:

+36 1 443 3033

If you have any questions about the processing carried out by the Data Controller or if you wish to exercise your rights under this Policy, please contact the Data Protection Officer through one of the contact details above, who will be pleased to assist you.

2. General Provisions:

The information set out in this section goes beyond what is required by law. The purpose of the following disclosure of information is to help you understand the **A) basic privacy concepts** that we use consistently in our privacy policy in accordance with the law. Under **B) General Principles of Our Data Management** and **C) Enhanced Technical and Organizational Measures Applied to Health Data Management and the Use of Artificial Intelligence (AI)**, we describe the additional measures we have taken to ensure a high level of data protection and security appropriate to the innovative nature of our services. Finally, for the sake of clarity, we provide an overview of the various data processing operations carried out within the framework of our service as part of the presentation of the **D) AIPDerm tele dermatology service**.

If you'd like to know more about how we process personal data in accordance with Article 13 of the GDPR, please go to menu item 3.

A) Basic concepts of data protection:

Data controller: the natural or legal person, public authority, agency, or any other body that, alone or jointly with other parties, determines the purposes and means of the processing of personal data; where the purposes and means of the data processing are determined by Union or Member State law, the controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law.

Data handling: any operation or set of operations performed on the data, irrespective of the process used, in particular any collection, recording, storage, organization, alteration, use, retrieval, disclosure, transmission, alignment or combination, blocking, erasure, or destruction of data, prevention of further use, taking of photographs, sound recordings, or images, and recording of physical characteristics that can be used to identify a person (e.g., fingerprints, palm prints, DNA samples, iris scans).

Data processor: a natural or legal person, authority, agency, or other body processing personal data on behalf of the controller.

Personal data: any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable natural person is someone who can be identified, directly or indirectly, in relation to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person, in accordance with one or more factors such as name, number, location data, an online identifier, or other identifiers.

Special categories of personal data: personal data revealing racial or ethnic origin, political opinion, religious or philosophical beliefs, trade union membership, genetic data or biometric data revealing the identity of natural persons, health data, and data concerning the sex life or sexual orientation of natural persons.

Health record: personal data relating to the physical or mental health of a natural person, including data relating to health services provided to a natural person that contains information about the health of the natural person.

B) Our data management principles:

Our data processing complies with the following principles in all cases:

- We will use the personal data for a valid, legitimate, and lawful purpose or purposes specified in this privacy policy or other information provided at the time of collection. We will use the personal data we process only for the purposes that we informed the data subject about at the time of collection or that were otherwise apparent to him or her from the circumstances of collection and for which he or she had a legitimate expectation of being used.
- We process data lawfully and fairly and in a transparent manner for the Data Subject.
- We only process data that is strictly necessary for the purposes of data processing.
- We ensure that the data we process is accurate and up-to-date and we will take all reasonable steps to ensure that inaccurate data is immediately deleted or corrected. We also ask for your cooperation in this regard, as in some cases, such as a change in data, we can only ensure that the data is up-to-date if you notify us of the change.
- The data is kept in a form that allows the identification of the data subjects only for the time necessary to achieve the purposes of the processing. In line with the principles of integrity and confidentiality, data processing will be carried out in a way that ensures adequate security of personal data by using appropriate technical or organizational measures.

C) Enhanced technical and organizational measures applied regarding health record management and the use of artificial intelligence (AI)

The use of the AIPDerm teledermatology application available at <https://www.aipderm.hu/> necessarily involves the processing of health data. Such data include, for example, the uploaded photos of the skin lesion, information on the health conditions requested in the application form, and the diagnosis and any additional therapeutic recommendations provided by the artificial intelligence (AI) application and the specialist. These special categories of health records are subject to strict confidentiality and professional secrecy obligations, protected by data protection and health legislation. Both the Data Controller, as a healthcare provider, and the dermatologists acting on its behalf are bound by strict professional secrecy by law. Pursuant to Act CLIV of 1997 on Health Care (the "**Health Care Act**"), "a health

care worker and any other person in an employment relationship with a health care provider shall be bound by a duty of confidentiality with respect to all data and other facts concerning the patient's state of health and which come to their knowledge in the course of providing health care services, whether obtained directly from the patient, during examination or treatment, indirectly from medical records, or by any other means, without time limitation".

And in the pre-assessment of our professional medical decision support system, based on the use of artificial intelligence by our collaborating specialists, we impose equally strict confidentiality and data security requirements on all our data processors, with whom we only share your personal data with your explicit consent. For further details on data processing, please see Section 3.A III below.

In addition, we are constantly improving the technical environment of our service to ensure that the information you share with us is as secure as possible.

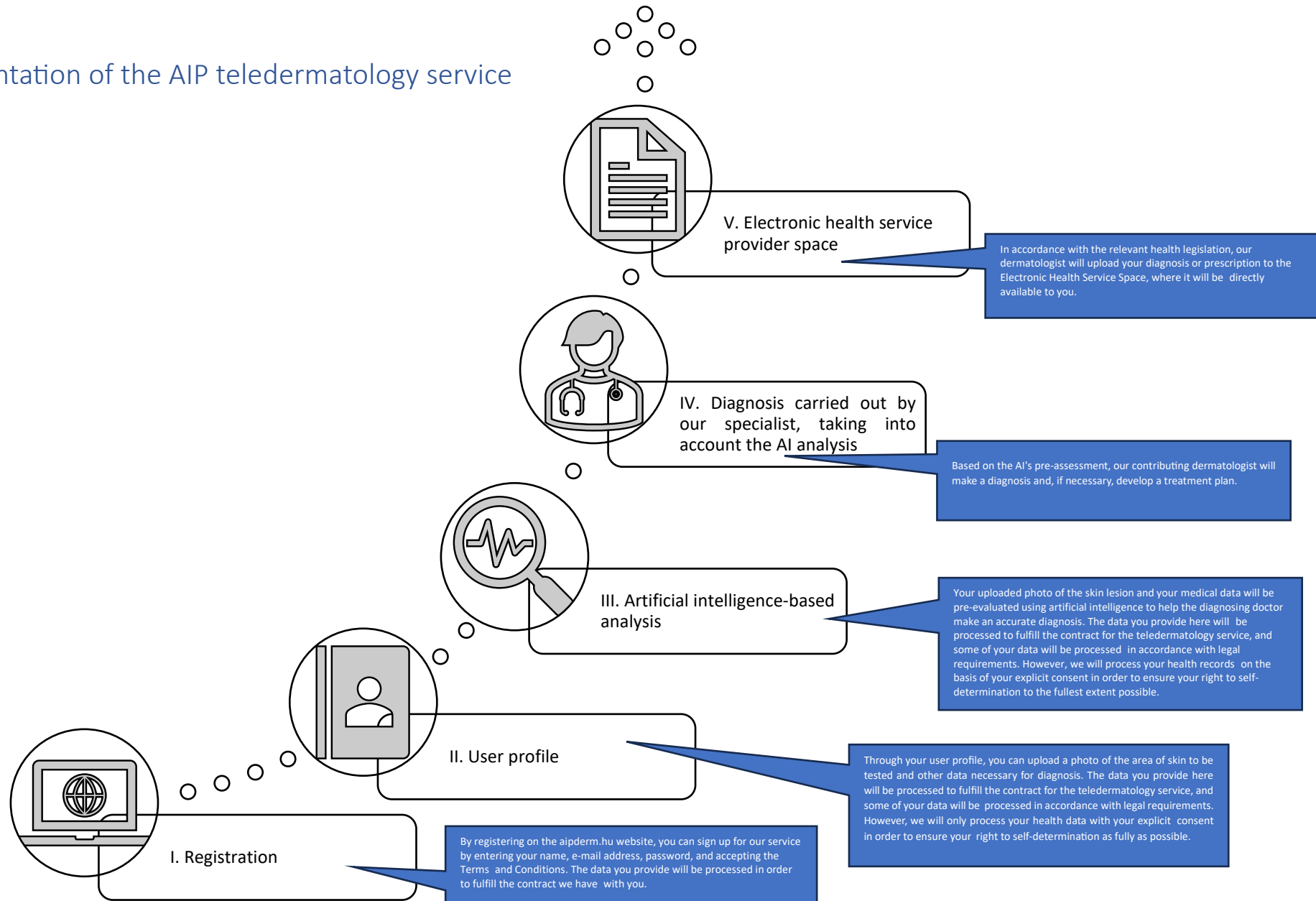
We have taken strict organizational and technical measures to ensure that your personal data remains protected.

- Our data center is located in Frankfurt, Germany, and your personal data is encrypted during transmission and storage and does not leave the European Union.
- Access to your data is controlled by a functional access control system. Access to your personal information, including your health records
 - Only doctors and those responsible for the effective implementation of the diagnosis have access, in each case under strict confidentiality.
- All AIPDerm employees are required to use multi-factor authentication (MFA).
- Backups are stored in multiple locations according to the highest professional standards, and only authorized personnel can access them.
- AIPDerm regularly reviews and updates its technological measures for the protection of personal data to ensure that it always uses the latest and most advanced data protection solutions.
- In all data processing activities, we pay special attention to limiting access to data and only processing data that is strictly necessary.
- Our developers monitor the data management processes on an ongoing basis to detect any security threats or incidents as quickly as possible.

However, it is of the utmost importance that you also take the necessary steps to prevent unauthorized access to your account. We therefore encourage you to take the following steps:

- use a strong password, that you only use in your AIPDerm account;
- never share your password with other people;
- limit access to your pc and your browser
- when you are finished using the AIPDerm service, log out from your profile

D) Presentation of the AIP teledermatology service



3. Details of certain data processing operations:

It follows from the activities of the Data Controller that it processes personal data for a variety of purposes, and the characteristics of the processing for each purpose, in particular its legal basis, the way in which it is carried out, and the associated retention periods, may differ. These aspects are set out below for each of the processing operations, in accordance with Article 13 of the GDPR. For the purpose of transparency and clarity, this privacy policy discusses our processing operations. For more information, please refer to the relevant sections of this privacy policy.

A) Data processing directly related to the teledermatology service AIPDerm:

I. Register for the AIPDerm teledermatology service	
Legal basis for data processing:	<ul style="list-style-type: none">- The legal basis for the processing of personal data is Article 6 paragraph (1) point (b) of the GDPR, which states that processing is a necessary condition for the performance of a contract to which you are a party or is necessary for the performance of a task carried out at your request prior to the conclusion of the contract.- In this case, a contract for the AIPDerm teledermatology service is concluded between the data controller and you by registering on the www.aipderm.hu website and accepting the relevant general terms and conditions.
Scope of the data processed:	<ul style="list-style-type: none">- name;- e-mail address;- password;- unique user identification number (further on, referred to as "Registration data")- mandatory data to be recorded in health records under the Health Act. (For more information on the details of this processing and the exact scope of the data, please see the section on 'Processing required by law').
Data recipients:	<ul style="list-style-type: none">- AIP Medical Holding Ltd. (registered office: 1126 Budapest, Szendrő street 30, II. floor; company registration number: 01-10-141306; e-mail: support@aip.ai) Data Processor of the Data Controller, providing the artificial intelligence-based medical device used in the provision of the AIPDerm teledermatology service and the technical background necessary for its operation.- Amazon Web Services EMEA SARL

	<p>(székhely: 38 Avenue John F. Kennedy, L-1855, Luxembourg; Incorporation No.: IE908705; contact adress: https://aws.amazon.com/contact-us/)</p> <p>The data dontrroller's data processor, which provides the hosting services necessary for the provision of the AIPDerm teledermatology service.</p>
Data transfers to third countries or international organisations:	The data controller does not transfer the data subject's personal data to third countries or international organizations.
Timeframe of data management:	The data controller processes the above-mentioned data of the data subject until the deletion of his or her user account.
Possible consequences of not providing data:	If the data subject does not provide the data controller with the necessary data, the data subject will not be able to use the AIPDerm teledermatology service. The use of the service is voluntary.
Automatic decision-making and profiling:	The above processing of data does not involve automated decision-making or profiling.

II. Data processing related to the AIPDerm user account	
Legal basis for data processing:	<p>The legal basis for the processing of personal data is Article 6 paragraph (1) point (b) of the GDPR, which states that processing is a necessary condition for the performance of a contract to which you are a party or is necessary for the performance of a task carried out at your request prior to the conclusion of the contract.</p> <ul style="list-style-type: none"> - In this case, the contract for the AIPDerm teledermatology service is concluded between the data controller and you by registering on the website www.aipclinic.hu and accepting the relevant general terms and conditions. <p>Data marked in bold below are considered health records, for the processing of which additional legal grounds are required under Article 9 of the GDPR. Depending on the specific processing of the health record, these legal bases are as follows:</p> <ul style="list-style-type: none"> - In the framework of the teledermatology service AIPDerm, our artificial intelligence-based application provides decision-making support to the attending physician prior to diagnosis. The legal basis for the processing of your health data in our AI-

	<p>based decision support system is your explicit consent (Article 9 paragraph (2) point (a) GDPR), which you can provide during registration. For more information on the details of this processing, please see Section III below.</p> <ul style="list-style-type: none"> ○ If you do not consent to the temporary storage of your health records in your account, we will not be able to send feedback on the results of the test to your account, and we will not be able to send the results of the test to the Electronic Health Service Space (further referred to as "EHSSS"). As we can only provide our service if you provide us with the necessary health records via your profile, our service will be limited without this information. For further details, please contact Customer Services.
<p>Scope of managed data:</p>	<ul style="list-style-type: none"> - [Registration data according to menu point I.]. - picture uploaded of the skin lesion; - information relating to skin lesions (indication of the affected body part; indication of the extent of the skin lesion; the date of occurrence of the Skin lesions; the fact that itching / peeling / pain has occurred on the skin area affected; fact that the heat has risen; a detailed description of the symptoms experienced; other relevant information provided for the skin changes); - Information on the selected service package; - the scope of mandatory information to be recorded in the health documentation under the Health Act; (Further information on the details of this data processing and the exact scope of the data can be found under the heading 'Legal Data Processing'). - a detailed description of the diagnosis and treatment plan, as well as its date; - further detailed health information related to the diagnosis; - name of the doctor. <p>(Further on referred to as „Health Records“)</p>
<p>Addressees of data:</p>	<ul style="list-style-type: none"> - AIP Medical Holding Ltd. (registered office: 1126 Budapest, Szendrő Street 30. II. floor; Incorporation No.: 01-10-141306; e-mail: support@aip.ai) The data processor of the Data Controller, that provides the medical device based on artificial intelligence used in the provision of the AIPDerm teledermatological service and the technical background necessary for its operation. - Amazon Web Services EMEA SARL (registered office: 38 Avenue John F. Kennedy, L-1855, Luxembourg; Incorporation No.: IE908705; contact address: https://aws.amazon.com/contact-us/) - The data processor of the Data Controller, which provides the storage service necessary for the provision of the AIPDerm teledermatological service.

	<ul style="list-style-type: none"> - Doctors and other members of the medical staff who contribute to the health services provided by the Data Controller, who carry out the diagnosis under their independent data controller and medical professional responsibility based on the photographs submitted.
Data transfers to third countries or international organisations:	The data controller does not transfer the data subject's personal data to third countries or international organizations.
Timeframe of data management:	The registration data will be processed by the data controller until the user's account is deleted (see point I above for details). The health records will be stored in your account for a limited period of time, up to one (1) year after the diagnosis is sent, after which, in accordance with the principle of limited data retention, the health records will be deleted and will be available to you only in the practitioner's register or through your EESZT account. In order to provide you with the fullest possible right to informational self-determination with respect to your personal data, you may delete your health data from your user profile prior to the expiration of the one (1) year data retention period set forth above by using the delete function in your user profile. In this case, your health records will only be available in your EESZT account. The retention period of the health records to be kept by the attending doctor is determined by the applicable legislation. On this basis, the doctor acting as an intermediary for the data controller is obliged to keep the medical records of the data subject for a period of thirty (30) years from the date of recording. For further details on data management in this regard, please refer to Section IV.
Possible consequences of not providing data:	In the event that the data subject does not provide the necessary data to the data controller, the data subject will not be able to use the AIPDerm teledermatology service. If the data subject deletes the health records from his or her profile, he or she will not be able to perform subsequent comparative tests based on the health records when using the service. The use of the service is voluntary.
Automatic decision-making and profiling:	The above processing of data does not involve automated decision-making or profiling.

III. Data processing associated with an artificial intelligence (AI) prediagnostic decision support system as part of the AIPDerm teledermatology service.	
Legal basis for data processing:	The legal basis for the processing of personal data is Article 6 paragraph (1) point (b) of the GDPR , which states that processing is a necessary condition for the performance of a contract to which you are a party or is necessary for the performance of a task carried out at your request prior to the conclusion of the contract.

	<ul style="list-style-type: none"> - In this case, the contract for the AIPDerm teledermatology service is concluded between the data controller and you by registering on the website www.aipclinic.hu and accepting the relevant general terms and conditions. <p>Data marked in bold below are considered as health records, for the processing of which additional legal grounds are required under Article 9 of the GDPR. Depending on the specific processing of the health record, these legal bases are as follows:</p> <ul style="list-style-type: none"> - In the framework of the teledermatology service AIPDerm, our artificial intelligence-based application provides decision-making support to the attending doctor prior to diagnosis. The legal basis for the processing of your health records by our AI-based decision-making support system is your explicit consent (Article 9 paragraph (2) point (a) GDPR), which you can provide when submitting your Health Records. - In case you do not give your consent for your health record to be pre-assessed by our AI-based technology, our service will be limited to sending you the diagnosis of the specialist. Given that our AI technology can effectively identify more than 700 skin conditions, skipping this step may significantly reduce the accuracy of the resulting diagnosis. As the main element of our service is to take advantage of our AI technology, if you do not wish to take advantage of this segment of our service, please contact our customer service team for information on how to receive a diagnosis excluding AI technology.
Scope of managed data:	<ul style="list-style-type: none"> - a unique user identification number; - an uploaded photo of the skin lesion; - information related to the skin lesion (identification of the affected body part; indication of the extent of the skin lesion; date of occurrence of the skin lesion; fact of itching/peeling/pain on the affected skin area; fact of fever; detailed description of the symptoms experienced; other relevant information provided about the skin lesion).
Addressees of data:	<ul style="list-style-type: none"> - AIP Medical Holding Ltd. (registered office: 1126 Budapest, Szendrő Street 30. II. floor; Incorporation No.: 01-10-141306; e-mail: support@aip.ai) The data processor of the Data Controller, that provides the medical device based on artificial intelligence used in the provision of the AIPDerm teledermatological service and the technical background necessary for its operation. - Amazon Web Services EMEA SARL (registered office: 38 Avenue John F. Kennedy, L-1855, Luxembourg; Incorporation No.: IE908705; contact address: https://aws.amazon.com/contact-us/) - The data processor of the Data Controller, which provides the storage service necessary for the provision of the AIPDerm teledermatological service. - Doctors and other members of the medical staff who contribute to the health services provided by the Data Controller, who carry out the diagnosis under their independent data controller and medical professional responsibility based on the photographs submitted.

Data transfers to third countries or international organizations:	The data controller does not transfer the data subject's personal data to third countries or international organizations.
Timeframe of data management:	The registration data will be processed by the data controller until the user's account is deleted (see point I above for details). The health records will be stored in your account for a limited period of time, up to one (1) year after the diagnosis is sent, after which, in accordance with the principle of limited data retention, the health records will be deleted and will be available to you only in the practitioner's register or through your EESZT account. In order to provide you with the fullest possible right to informational self-determination with respect to your personal data, you may delete your health data from your user profile prior to the expiration of the one (1) year data retention period set forth above by using the delete function in your user profile. In this case, your health records will only be available in your EESZT account. The retention period of the health records to be kept by the attending doctor is determined by the applicable legislation. On this basis, the doctor acting as an intermediary for the data controller is obliged to keep the medical records of the data subject for a period of thirty (30) years from the date of recording. For further details on data management in this regard, please refer to Section IV.
Possible consequences of not providing data:	In the event that the data subject does not provide the necessary data to the data controller, the data subject will not be able to use the AIPDerm teledermatology service. If the data subject deletes the health records from his or her profile, he or she will not be able to perform subsequent comparative tests based on the health records when using the service. The use of the service is voluntary.
Automatic decision making and profiling:	The above processing does not involve automatic decision-making or profiling, but the processing under this point does involve the use of a medical device based on artificial intelligence. The medical device based on artificial intelligence provides its results to the contributing specialist only as a weighted decision making option, so in any case a specialist will provide you with a diagnosis.

IV. Processing based on a legal obligation in relation to the provision of the teledermatology health service AIPDerm Provision of telemedicine health services by a specialist, diagnosis and provision of a treatment plan to the Data Subject	
Name of data controllers:	Both AIP Medical Hungary Ltd, as the provider of the AIPDerm service, and the dermatologist acting as its contributor, as health care providers, are considered as independent data controllers in the course of the processing of data under this section, with regard to their independent health care professional responsibilities and obligations.

<p>Legal basis for data processing:</p>	<p>The legal basis for the processing of personal data is Article 6 paragraph (1) point (c) of the GDPR, stating that the processing is necessary for compliance with a legal obligation to which the data controllers are subject.</p> <ul style="list-style-type: none"> - In the present case, the data controllers providing the services, as health care providers, are subject to the following mandatory data processing based on health care legislation, in particular: <ul style="list-style-type: none"> o in Act CLIV of 1997 ("Eütv.") § 136, o Act XLVII of 1997 ("Eüak.") §§ 28-32/A, 35/A to 35/O and the annexes, o Article 12 (1) of EMMI Decree No. 39/2016 (XII.21.), o § 85 of Act LVIII of 2020. <p>The data identified below are considered health records, the processing of which requires an additional legal basis under Article 9 of the GDPR. Taking into account that the controllers under this point are acting in their capacity as healthcare providers in the scope of their medical and legal obligations, the provisions of Article 9 paragraph (2) point (h) of the GDPR, they are entitled to process health records in view of the fact that 'the processing is necessary for preventive healthcare purposes, for the establishment of a medical diagnosis, for the provision of healthcare or treatment under EU law or Member State law or under a contract with a health professional and subject to the conditions and guarantees that the processing of such data is carried out by or under the responsibility of a professional subject to the obligation of professional secrecy under EU law or Member State law.</p>
<p>Scope of managed data:</p>	<p>Legislations define the scope of personal data that must be recorded or kept as part of the medical record (Eüak. § 9 (1)) as follows:</p> <ul style="list-style-type: none"> - personal identification data (e.g. name, address [place of residence, residence], date and place of birth, mother's name), - Health Records (e.g. medical history, diagnosis, name of the disease, procedures performed, medication or other therapy, social security number, European Health Insurance Card number, name of the health care professional who registered the patient, medical records, imaging scans, nursing records, gender, allergies (optional), medications taken regularly (optional), chronic diseases or surgery dating back 10 years (optional), skin colour, location of skin anomaly on the body, anomaly distribution, anomaly duration, fact of itching, pain, fever, peeling), - other special categories of personal data, such as data concerning racial or ethnic origin, sexual life or sexual orientation, if relevant to providing the health care service. <p>Scope of data required by law to be included on prescriptions for medicines, medical devices and medical care:</p> <ul style="list-style-type: none"> - the name, address and date of birth of the Data Subject, - in the case of prescriptions with social security benefits, in addition to the above mentioned requirements, the social security number of the person concerned, the code of his/her illness according to the International Classification of Diseases (BNO code), and

	<ul style="list-style-type: none"> - in the case of a patient who is entitled to prescription exemption, in addition to the above, the number of the prescription exemption certificate. - in the case of a prescription ordered via EESZT, in addition to the above, the gender of the data subject, the social security number of the Data Subject or, in the absence of such number, the number of any other document used to identify the Data Subject.
Addressees of data:	<ul style="list-style-type: none"> - AIP Medical Holding Ltd. (Registered office: 1126 Budapest, Szendrő Street 30. II. floor; Incorporation No.: 01-10-141306; e-mail: support@aip.ai) If you have given your explicit consent to the creation of a user account under point II or to the use of artificial intelligence technology under point III, the dermatologist acting with the assistance of the Data Controller will upload the final diagnosis to your AIPDerm account. The data will thus be shared with this processor of the Data Controller, who will provide the AI-based solution and the related technical support for the operation and development of the system used in the provision of the AIPDerm teledermatology service, only to the extent necessary for the performance of their tasks and only in accordance with the principles of data processing (in particular the principles of purpose limitation and data minimisation). - For the body operating the Electronic Health Service Space ("EESZT") (Eüak. 35/A.-35/O. §§, according to the provisions of the EMMI Decree 39/2016.(XII.21.) EMMI Decree 12. - In certain cases, to the competent patient's legal representative (31§ of the Health Insurance Act). - To a body outside the healthcare network in the event of a request or a legal obligation to provide information (e.g. court, prosecutor's office, investigating authority) (§§ 23-27 of the Health Care Act) - Amazon Web Services EMEA SARL (registered office: 38 Avenue John F. Kennedy, L-1855, Luxembourg; IncorporationNo.: IE908705; contact address: https://aws.amazon.com/contact-us/) If you have given your explicit consent to the creation of a user account under point II or to the use of artificial intelligence technology under point III, the dermatologist acting in collaboration with the data controller will upload the final diagnosis to your AIPDerm account so that the data will be shared with this data processor of the data controller who provides cloud storage services for the provision of the AIPDerm teledermatology service.
Data transfers to third countries or international organizations:	The data controller does not transfer the data subject's personal data to third countries or international organizations.
Timeframe of data management:	Data controllers shall record the health data relating to the data subject in a medical record, the mandatory period of retention of which is determined by the applicable legislation. On this basis, the doctor acting as an intermediary for the data controller is obliged to keep the medical records of the data subject for thirty (30) years from the date of recording.

Possible consequences of not providing data:	The submission of health and personal identification data by the data subject is voluntary, excluding the mandatory submission of personal identification data for the purposes of receiving healthcare. The disclosure of personal data is necessary for the provision of healthcare services by the data controllers. Consequence of not providing the data: the data subject is not entitled to receive the data from the data controller. The data controller will not be able to provide healthcare services to the data subject.
Automatic decision making and profiling:	The above processing of data does not involve automated decision-making or profiling.

B. Data processing indirectly related to the teledermatology service AIPDerm:

I. Data processing related to invoicing, tax and accounting obligations and settlement of accounts in connection with contracts with the data controller.	
Legal basis for data processing:	<p>The legal basis for the processing of personal data is Article 6 paragraph (1) point (c) of the GDPR, stating that the processing is necessary for compliance with a legal obligation to which the data controllers are subject.</p> <ul style="list-style-type: none"> - In the present case, the data controllers providing the services, as health care providers, are subject to the following mandatory data processing based on health care legislation, in particular: <ul style="list-style-type: none"> o For the fulfilment of tax and accounting obligations: the processing is necessary for the fulfilment of a legal obligation applicable to the Data Controller (e.g. Article 159 of Act CXXVII of 2007 on Value Added Tax, Article 12 of Act C of 2000 on Accounting).
Scope of managed data:	<ul style="list-style-type: none"> - personal identification data (e.g. name, address [place of residence, residence], date and place of birth, mother's name), - tax identification number/ID number, - customer identifiers used by your own and other businesses (e.g. insurance companies, benefit managers, health insurance companies), - health records (e.g. type and date of service received), - other billing information (e.g. amount to be paid, method of payment, time of payment, payment deadline, any discounts) and accounting records
Addressees of data:	<ul style="list-style-type: none"> - AIP Medical Holding Ltd. (Registered office: 1126 Budapest, Szendrő utca 30, II. floor; Incorporation No.: 01-10-141306; e-mail: support@aip.ai)

	<p>The data processor of the data controller, which provides the artificial intelligence-based solution and the related technical support for the operation and development of the system used in the provision of the AIPDerm teledermatology service, only to the extent necessary for the performance of its tasks and only in accordance with the privacy principles (in particular the purpose limitation and data economy principles).</p> <ul style="list-style-type: none"> - The accounting and auditing firm of the data controller. - The following companies, that provide credit card payment and billing services: Stripe, Inc. (354 Oyster Point Boulevard, South San Francisco, California, 94080, USA; https://stripe.com/en-hu/privacy); KBOSS.hu Ltd. (1031 Budapest, Záhony utca 7., https://www.szamlazz.hu/adatvedelem/); Simplepay (OTP Mobil Szolgáltató Ltd. Head office: 1143 Budapest, Hungária krt. 17-19 [https://simplepay.hu/adatkezesi-tajekoztatok/]) - Amazon Web Services EMEA SARL (Registered office: 38 Avenue John F. Kennedy, L-1855, Luxembourg; company registration number: IE908705; contact address: https://aws.amazon.com/contact-us/) Data processor of the data controller providing cloud storage services in the course of providing the AIPDerm teledermatology service.
Data transfers to third countries or international organizations:	The data controller does not transfer the data subject's personal data to third countries or international organizations.
Timeframe of data management:	<p>The data controller shall keep the data set out in its annual accounts, annual report, supporting inventory, evaluation, general ledger extract, logbook, or other records complying with the requirements of the Act for a period of eight (8) years (Article 169 of Act C of 2000 on Accounting).</p> <p>The data controller is obliged to keep personal data contained in invoices and other accounting documents and the supporting records until the expiry of the tax assessment right (i.e., five (5) years from the last day of the calendar year in which the tax liability related to the records was fulfilled) (Act No. XCII Act of 2003 on Taxation (§ 78, Act CXXVII of 2007 on Value Added Tax (§ 179)), unless an official audit or official/judicial proceedings have been initiated within this period, in which case until the final/legally binding conclusion of the proceedings.</p>
Possible consequences of not providing data:	<p>The transfer of your personal data is based on law, the transfer of personal data is a precondition for the conclusion of a contract. Consequence of not providing the required data: the Data Controller is unable to provide the Data Subject with health services.</p>

Automatic decision making and profiling:	The above processing of data does not involve automated decision-making or profiling.
---	---

II. Data processing related to newsletters	
Legal basis for data processing:	<p>The legal basis for the processing of personal data is Article 6 paragraph (1) point (a) of the GDPR, stating that the Data Subject has given his or her consent to the processing of his or her personal data for the purposes for which it is processed.</p> <ul style="list-style-type: none"> - In the present case, you give your consent to receive a newsletter by ticking the relevant box when registering on the website. The consent is voluntary. The Data Subject has the right to withdraw his or her consent anytime, without prejudice to the lawfulness of the processing carried out before the withdrawal.
Scope of managed data:	<ul style="list-style-type: none"> - name, - email address.
Addressees of data:	<ul style="list-style-type: none"> - AIP Medical Holding Ltd. (registered office: 1126 Budapest, Szendrő utca 30, II. floor; Incorporation No.: 01-10-141306; e-mail: support@aip.ai) Data processor of the data controller, providing the artificial intelligence-based solution and related system operation and the development of technical support used in the provision of the AIPDerm teledermatology service, only to the extent necessary for the performance of their tasks and only in accordance with the data management principles (in particular the purpose limitation and data economy principles). - Amazon Web Services EMEA SARL (registered office: 38 Avenue John F. Kennedy, L-1855, Luxembourg; Incorporation No.: IE908705; contact address: https://aws.amazon.com/contact-us/) Data Processor of the data controller, providing cloud storage services for the provision of the AIPDerm teledermatology service.
Data transfers to third countries or international organizations:	The data controller does not transfer the data subject's personal data to third countries or international organizations.
Timeframe of data management:	Until the withdrawal of the data subject's consent (e.g. unsubscribing from the newsletter).

Possible consequences of not providing data:	The transfer of your personal data is not based on a legal or contractual obligation, and the transfer of personal data is not a precondition for entering into a contract. Consequences of not providing the data: the data subject will not be informed of current news, offers and events.
Automatic decision making and profiling:	The above processing of data does not involve automated decision-making or profiling.

<p>III. Handling complaints, and data processing related to the non-performance of the contract</p> <p>(i) Handling and responding to complaints about the data controller's activities and the services it provides, and collecting the necessary information, (ii) handling cases and procedures related to the non-performance of a contract with the data subject or a partner related to the data subject, (iii) to enable the application of legal sanctions for non-performance of the contract; (iv) to bring and enforce legal and other claims; (v) to defend legal and other claims in and out of court and in and out of court proceedings; (vi) to respond to requests from public authorities and other bodies in legal and other proceedings.</p>	
Legal basis for data processing:	<p>The legal basis for the processing of personal data is Article 6 paragraph (1) point (f) of the GDPR, stating that the processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party.</p> <ul style="list-style-type: none"> - - In this case, the legitimate interest is: the legitimate interest of the data controller in bringing, asserting and defending legal claims. <p>The data subject may object to this processing. If an objection is raised, the data controller considers whether there are any compelling legitimate grounds that override the interests, rights, and freedoms of the data subject or that are related to the submission, exercise, or defense of legal claims. We inform the data subject that, in the event of a complaint, the data controller is subject to the applicable law (in particular, the provisions of Act CLV of 1997 on Consumer Protection). [Further: "Consumer Protection Act"] from § 17/A and § 29 of the Healthcare Act). The data is also processed in order to comply with legal obligations.</p> <p>The processing of special categories of personal data is based on Article 9 paragraph (2) point (f) of the GDPR, as the processing of these data is necessary for the submission, exercise, or defense of legal claims or when courts are acting in their judicial role.</p>
Scope of managed data:	<ul style="list-style-type: none"> - personal identification data (e.g. name, address (place of residence, residence), - tax identification number, - customer identifiers used by your own and other businesses (e.g. insurance companies, benefit managers, health insurance companies),

	<ul style="list-style-type: none"> - health records (e.g. type and date of service used), - other billing information (e.g. amount to be paid, method of payment, time of payment, payment deadline, any discounts), - facts relating to the performance of the contract, other data, - data relating to legal procedures (e.g. type, number, status of legal proceedings, statements made in legal proceedings), - in the case of a complaint, the data provided in Article 17/A paragraph (5) of the Consumer Protection Act, in particular the name and address of the data subject as consumer, the place, time and manner of filing the complaint, a detailed description of the data subject's complaint as consumer, the documents presented by the consumer, - documents and other evidence, the statement of the business's position on the complaint, the signature of the consumer as the complainant, the place and time of the recording of the complaint, the telephone or other electronic communication service used to record the complaint - in case of an oral complaint, the unique identification number of the complaint.
Addressees of data:	<ul style="list-style-type: none"> - AIP Medical Holding Ltd. (registered office: 1126 Budapest, Szendrő street 30, II. floor; Incorporation No.: 01-10-141306; e-mail: support@aip.ai) Data processor of the data controller, providing the artificial intelligence-based solution and related system operation and development technical support used in the provision of the AIPDerm teledermatology service, only to the extent necessary for the performance of their tasks and only in accordance with the data management principles (in particular the purpose limitation and data minimization principles). - Amazon Web Services EMEA SARL (registered office: 38 Avenue John F. Kennedy, L-1855, Luxembourg; Incorporation No.: IE908705; contact address: https://aws.amazon.com/contact-us/) - The data processor of the data controller, providing cloud storage services in the provision of the AIPDerm teledermatology service.
Data transfers to third countries or international organisations:	The data controller does not transfer the data subject's personal data to third countries or international organizations.
Timeframe of data management:	The data controller is required to keep a copy of any record of the complaint and a copy of the response for three (3) years (Section 17/A paragraph (7) of the Consumer Protection Act). If to the above additional data is processed, the data controller must process the data for a period of five (5) years from the termination of all legal obligations of the data controller under the legal relationship between the data subject or the partner in a legal relationship with the data subject and the data controller, in accordance with the general statute of limitations under Act V of 2013 on the Civil Code (further on referred to as "Ptk.").

Possible consequences of not providing data:	In the case of a complaint regarding a failure to provide information, the complaint concerned may not be answered or may not be answered adequately. Otherwise, in the case of failure to provide data, slower, more difficult negotiation and procedures in relation to the non-performance of the contract.
Automatic decision making and profiling:	The above processing of data does not involve automated decision-making or profiling.

IV. Data management related to the processing of contact details	
Legal basis for data processing:	<p>A személyes adatok kezelésének jogalapja a GDPR 6. cikk (1) bekezdés f) pontja, miszerint az adatkezelés az adatkezelő vagy egy harmadik fél jogos érdekeinek érvényesítéséhez szükséges.</p> <ul style="list-style-type: none"> - In the present case, this legitimate interest is: the interest in the effective operation of the services provided by the data controller. The data subject may object to this processing. In the event of an objection, the data controller considers whether there are compelling legitimate grounds that override the interests, rights and freedoms of the data subject or that are related to the submission, exercise or defence of legal claims.
Scope of managed data:	<ul style="list-style-type: none"> - name, title and contact details (phone number, email address, postal address, other electronic contact details), - the right to make a declaration (e.g. in the case of an authorisation to make a declaration), - authorization to access to health records
Addressees of data:	<ul style="list-style-type: none"> - AIP Medical Holding Ltd. (registered office: 1126 Budapest, Szendrő street 30, II. floor; Incorporation No.: 01-10-141306; e-mail: support@aip.ai) - Data processor of the data controller, providing the artificial intelligence-based solution and related system operation and development technical support used in the provision of the AIPDerm teledermatology service, only to the extent necessary for the performance of their tasks and only in accordance with the data management principles (in particular the purpose limitation and data minimization principles). - Amazon Web Services EMEA SARL (registered office: 38 Avenue John F. Kennedy, L-1855, Luxembourg; Incorporation No.: IE908705; contact address: https://aws.amazon.com/contact-us/) - Data processor of the data controller, providing cloud storage services for the provision of the AIPDerm teledermatology service. - to the accounting firm of the data controller, - to a lawyer or law firm acting on behalf of the data controller, - tax authorities, other public authorities or courts (e.g. in the context of compulsory or subpoena-based reporting).

Data transfers to third countries or international organisations:	The data controller does not transfer the data subject's personal data to third countries or international organizations.
Timeframe of data management:	(1) for five (5) years from the date of termination of all obligations under a contract with the data subject or a person associated with the data subject, or (2) in the absence of a contract, until the end of the business arrangement, or (3) if the data subject's association with the person who entered into the contract is terminated earlier, until the date of notification of such termination.
Possible consequences of not providing data:	Communications or contracts may not be carried out, in whole or in part, or may be carried out incorrectly or late.
Automatic decision making and profiling:	The above processing of data does not involve automated decision-making or profiling.

V. Data management related to quality control and customer satisfaction management:	
Legal basis for data processing:	<p>The legal basis for the processing of personal data is Article 6 paragraph (1) point (f) of the GDPR, which states that the processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party.</p> <ul style="list-style-type: none"> - In this case, this legitimate interest: the interest of the data controller in maintaining, improving and developing the quality of its services. <p>The data subject may object to processing based on legitimate interest. In the event of an objection, the data controller considers whether there are compelling legitimate grounds which override the interests, rights and freedoms of the data subject or which are related to the submission, exercise or defence of legal claims.</p>
Scope of managed data:	<ul style="list-style-type: none"> - Data necessary to identify the data subject, - Ratings given by the data subject measuring the quality of the data controller's services, - Other feedback, opinions of the data subject.
Addressees of data:	<ul style="list-style-type: none"> - AIP Medical Holding Ltd. - (registered office: 1126 Budapest, Szendrő street 30, II. floor; Incorporation No.: 01-10-141306; e-mail: support@aip.ai) <p>Data processor of the data controller, providing the artificial intelligence-based solution and related system operation and</p>

	<p>development technical support used in the provision of the AIPDerm teledermatology service, only to the extent necessary for the performance of their tasks and only in accordance with the data management principles (in particular the purpose limitation and data minimization principles).</p> <ul style="list-style-type: none"> - Amazon Web Services EMEA SARL (registered office: 38 Avenue John F. Kennedy, L-1855, Luxembourg; Incorporation No.: IE908705; contact address: https://aws.amazon.com/contact-us/) - Data processor of the data controller, providing cloud storage services for the provision of the AIPDerm teledermatology service. Zendesk, Inc. (headquarters: 989 Market St, San Francisco, CA 94103; https://www.zendesk.com/company/agreements-and-terms/privacy-notice/) - Company providing integrated interactive interfaces for quality assurance assessment and feedback on the data controller's website.
Data transfers to third countries or international organisations:	The data controller does not transfer the data subject's personal data to third countries or international organizations.
Timeframe of data management:	The data controller stores the data for a period of five (5) years in accordance with the general limitation period under the Civil Code.
Possible consequences of not providing data:	Providing data is voluntary. Failure to provide feedback on customer satisfaction will have no negative consequences for the data subject.
Automatic decision making and profiling:	The above processing of data does not involve automated decision-making or profiling.

VI. Development of AIPDerm technology based on artificial intelligence
Your personal data will not be used to develop the artificial intelligence (AI) that forms part of the AIPDerm teledermatology service and therefore your personal data will not form part of the learning set of the AI algorithm.

VII. Psycho-dermatological surveys

After using the service, you will be given the opportunity to take part in a psycho-dermatological questionnaire. The survey is completely anonymous and does not involve the processing of your personal data. Participation in the survey is voluntary. Refusal to participate in the survey will not have any negative consequences for you.

4. Cookies and related technologies

For more information on the use of cookies and similar technologies used on our website, please read our Cookie Policy.

5. Data transfers outside the EU/EEA

Your personal data may be transferred outside the European Union (EU) or the European Economic Area (EEA) only to countries that ensure an appropriate level of data protection in accordance with the relevant rulings of the European Commission (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en). The transfer of your personal data to a country outside the EU/EEA that does not ensure an appropriate level of data protection will only take place after the data controller and the recipients of the data have entered into an agreement, also approved by the European Commission, containing provisions and appropriate guarantees to ensure the protection of your personal data, so-called "general data protection clauses", or if the transfer is necessary to process your requests. You can request a complete and updated list of transfers to countries outside the EU/EEA from the data controller at the address indicated above, find out about the specific guarantees that have been agreed and, if you wish, request a copy of them.

6. Your data protection rights

As a data subject, you are entitled to:

- receive confirmation as to whether we are processing personal data relating to you and, if so, have the right to access the personal data and related information (including in particular the purposes for which the data are processed; the categories of personal data processed; the recipients or categories of recipients to whom the data are or will be disclosed; the retention period or the criteria used to determine it; your right to rectification, erasure or restriction of the processing; your right to submit a complaint to a supervisory authority; the origin of the data; whether the processing is carried out with the help of automated means, including profiling, and if so, relevant information about the logic involved and the significance of such processing and its likely consequences for the data subject; the appropriate guarantees in the event of a transfer of personal data outside the EU/EEA and the right to be

provided with a copy of the personal data processed, provided that the request for a copy does not adversely affect the rights and freedoms of others (**right of access**);

- the data controller to correct your personal data, i.e. you have the right to request the correction, modification or updating of any inaccurate data and to request the completion of incomplete personal data, including by means of supplementary statements (**right of rectification**);
 - request the data controller to delete personal data concerning you when (i) the personal data are no longer necessary for the purposes for which they were collected or processed, or (ii) the personal data have been unlawfully processed; or (iii) the personal data must be erased in order to comply with a legal obligation; or (iv) you have objected to their processing (see right to object below) and in all cases where there is no other legitimate ground for the data controller to continue to process the personal data (**right to be forgotten**). Erasure may not be carried out, in particular if it is necessary to comply with a legal obligation or to assert, defend or exercise a right before a court;
 - request the data controller to limit the processing of your personal data, i.e. to store such data without the data controller being able to use them. This right may only be exercised if (i) you challenge the accuracy of the personal data, in which case the restriction applies for the period of time that allows the data controller to verify the accuracy of such data, or (ii) the processing is unlawful and you have requested the restriction of the processing instead of its erasure, or (iii) although no longer necessary for the purposes of the processing, the personal data are necessary for the exercise or defence of a right before a court or tribunal, or (iv) you have objected to the processing (see below: "right to object"), provided that the legitimate interests of the data controller override your legitimate interests (**right to restrict processing**);
- receive personal data from the data controller relating to you processed under the contract in a commonly used, generic format and, where technically possible, request the direct transfer of personal data to a third party designated by you (**right to data portability**).

As a data subject, you also have the **right to object** to:

object at any time, on grounds relating to your particular circumstances, to the processing of your personal data based on legitimate interests, including profiling. In this case, the personal data may no longer be processed unless the data controller demonstrates that the processing is justified by a legitimate interest on your part that overrides your interests, rights, and freedoms or is related to the submission, exercise, or defense of legal claims. In the case of processing for direct marketing purposes, you may object at any time to the processing of personal data concerning you for such purposes, including profiling, where it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data will no longer be processed for these purposes.

In order to exercise these rights, you may contact the data controller at any time by sending a letter or e-mail to the above-mentioned address. If you consider that the processing of your personal data is unlawful, you have the right to submit a complaint to the data protection authority (in Hungary the National Data Protection and Freedom of Information Authority; address: H-1055 Budapest, Falk Miksa street 9-11; telephone: +36 -1-391-1400; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).

You may submit a complaint to a data protection authority other than the Hungarian data protection authority, provided that it is the data protection authority of an EU Member State where you have your permanent or habitual residence or where the alleged breach occurred, or, in the case of unlawful processing, you have the right to apply to the competent court in the place where you have your permanent or habitual residence. A list of competent data protection authorities can be found [here](#).

7. Links to other websites

The Website may contain links to external websites. The data controller does not guarantee or make any warranties regarding the content and information provided by third parties, its completeness or accuracy, the content of such third party websites and the products and services that may be offered through such third party websites, or the processing of personal data of users/visitors by such third parties. This Privacy Policy applies only to the website of the data controller and to the processing indicated.

8. Changes and availability of the guidelines

We may update this Guide at any time if it needs to be clarified or supplemented for any reason. The date at the beginning of the document determines and the date of the prospectus. Additions and amendments will take effect immediately upon publication of the updated prospectus. It will be published on our website. You are advised to consult the notice from time to time to keep up to date with any changes that may affect you.