



Privacy notice

The personal data we receive from you will be processed in the strictest confidence and in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data, data and on the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation), hereinafter referred to as the "GDPR", Personal Data Protection Act and under this Privacy Notice.

As legislative changes or changes in our internal processes may make it necessary to adapt this document, please read this Privacy notice regularly.

This Privacy notice covers personal data that is collect and processed when you visit www.acibademcityclinic.bg website and its subpages.

You can get more information about the conditions under which your personal data is processed by visiting the section "Personal Data Protection" on the website of your medical institution and by reading the Group Privacy Policy.

1. Data controller

The data controller in the sense of GDPR is :

ACIBADEM CITY CLINIC EAD, UIC 203279315, with address: 53 Nikola Yonkov Vaptsarov Blvd., 4th floor, Sofia 1407

2. Data protection officer

You can contact our data protection officer at:

Email: dpo@acibademcityclinic.bg

Address: 53 Nikola Vaptsarov Blvd., 3rd floor, Sofia 1407

phone: +359 878 739 296

3. Principles of personal data processing

Personal data is all information related to an identified or identifiable individual. This includes information such as your name, age, address, telephone number, date of birth, email address, IP address or user behavior. Information that cannot (or only be disproportionately) contacted, for example by anonymizing the information, does not constitute personal data. The processing of personal data (eg collection, retrieval, use, storage or transfer) always requires a legal basis or your consent.

The processed personal data will be deleted once the purpose of the processing has been fulfilled, and no statutory retention obligations must be observed .



In the event that we process your personal data for the provision of certain services, see the information below for the specific processes, the scope and purpose of data processing, the legal basis for processing and the corresponding retention period.

4. Data processing

4.1. Personal data collected by visiting our website www.acibademcityclinic.bg and its subpages

4.1. a) Scope and purpose of processing

We collect, record and use only the personal data to the extent necessary to ensure the functionality of the website.

When you access and use our website, we only collect personal data that your browser automatically transfers to our server. The information is temporarily stored in the so-called registration file. The following information is recorded without your intervention and stored until it is deleted automatically:

- IP address of the computer from which the request is sent,
- Date and time of access,
- Name and URL of the extracted file,
- Website accessed (reference URL),
- The browser used and, if applicable, the operating system of your computer, as well as the name of the person providing you with access.

The specified data will be processed by us for the following purposes:

- General management of the website;
- Providing a seamless connection to the website;
- Provides no convenient use of our website.

4.1. b) Legal basis

Article 6 (1) (f) of the GDPR serves as the legal basis for data processing. The processing of these data is necessary for the provision of our services and thus serves to protect the legitimate interests of our company.

Article 6 (1) (a) of the GDPR serves as a legal basis for the processing of the data we receive when you agree to the use of cookies that have a marketing purposes.

4.1. c) Data deletion and retention period

The subject's personal data is deleted or blocked once the storage purpose has been met. The collection of data for the provision of a website and the storage of data in the registration files is essential for the functioning of the website. Therefore, there is no possibility for the visitor to object. Further storage may be required in individual cases if required by law.

More information about this purpose of processing your personal data can be found in our Cookie Policy.

4.2. Personal data collected when subscribing to our e -newsletter

4.2. a) Scope and purpose of processing

On our website you have the opportunity to subscribe for our free e-newsletter. The newsletter informs you about news and services offered by the medical establishments of the Acibadem City Clinic group, as well as about current promotions related to your health and treatment . We will need your email address to register.

4.2. b) Legal basis

The processing of your personal data for the e-newsletter is based on the following freely given consent in accordance with Article 6 (1) (a) :

If you subscribe to receive an e-newsletter, you have provided the following statement of consent:

" I have read and understood the privacy policy with detailed and additional information and I agree with it.

Yes, I would like to subscribe to the e-newsletter of Acibadem City Clinic.

I am informed that I can withdraw my consent at any time without giving a reason for it by using the link to unsubscribe, wich is visible in the email with which I receive the e- newsletter.

I am informed that the controller will not process my personal data after the withdrawal of my consent, and that the withdrawal of consent will not affect the lawful processing of my personal data before that moment. "

4.2. c) Data deletion and retention period

Your email address will be stored while you subscribe to the e-newsletter. Once you unsubscribe from the newsletter, your email address will be deleted. Further storage may be required in individual cases if required by law.

4.3. Personal data collected by filling in the contact form

4.3. a) Scope and purpose of processing

To contact us, you can use the contact form. To use the contact form, we need the following information:

- Name and surname;
- E-mail address;
- Phone number.

You can attach a file with information to the form, but this is not required.

And the information provided to us will be sent to the medical institution by the Acibadem City Clinic group, whose patient you are or whose services you are interested in . The data you enter is transferred via a secure https / SSL connection. Your data will be deleted within 90 days of completion of processing, unless a longer retention period is



required for reasons related to verifiability, patient care, protection against legal claims or statutory retention periods.

4.3. b) Legal basis

The processing of the data referred to above (see point 4 (3) (a) for the purpose of establishing contact shall be carried out voluntarily in accordance with Article 6 (1) (a) of the GDPR on the declaration of consent, submitted by you as follows:

" I have read and understood the privacy policy with detailed and additional information and I agree with it.

By clicking the "send" button I give my explicit consent for the collection and processing of my two names, email and phone number.

I am informed that I can withdraw my consent at any time,, by sending an e-mail to dpo@acibademcityclinic.bg.

I am informed that the controller will not process my personal data after the withdrawal of my consent, and that the withdrawal of the consent will not affect the lawful processing of my personal data before that moment. "

4.3. c) Data deletion and retention period

Once the processing of your request has started and the relevant facts have been finally clarified, your personal data processed through the contact form will be deleted. Further storage may be required in individual cases if required by law.

4.4 . Personal data collected when you apply for a job in Acibadem City Clinic group

4.4 . a) Scope and purpose of processing

To apply for a job in the group of companies Acibadem City Clinic , we need the following information:

- Two names;
- Telephone;
- E-mail;
- CV;
- Actual photo.

The information provided to us will be processed by the Human Resources Department. If it is necessary to assess your application, your personal data can be disclosed to employees of the medical institution from the group Acibadem City Clinic, where the position was opened.

Your personal data will be processed exclusively for the purpose of conducting the recruiting process, namely: identification of the candidate, assessment of the skills and professional qualities of the candidate, verification of the candidate's knowledge and reputation, connecting with him/her for an interview and conducting interviews,



creating an appropriate environment for the selection of the job applicant, establishing the necessary training to adapt to the requirements of the workplace, preparing the conditions for signing the employment contract with the selected job candidate.

This Privacy notice covers preliminary checks carried out and submitted by the applicant so documents in the process of recruitment. Selected job applicants will receive a separate notification regarding the processing of personal data of employees .

4.4 . b) Legal basis

The processing of your personal data for applying for a job is based on the following freely given consent in accordance with Article 6 (1) (a), provided that you have made the following statement of intent:

" I have read and understood the privacy policy with detailed and additional information and I agree with it.

By filling in my two names, telephone and e-mail, enclosing my CV and photo and clicking on the "apply " button , I give my explicit consent to Acibadem City Clinic EAD to use the data provided by me for the purposes of the recruiting process for specific job position. I am informed that I can withdraw my consent at any time and without giving reasons, by sending an email to dpo@acibademcityclinic.bg .

I am informed that the controller will not process my personal data after the withdrawal of my consent, and that the withdrawal of the consent will not affect the lawful processing of my personal data before that moment. "

4.4 . c) Data deletion and retention period

The personal data of candidates who do not meet the requirements for the vacancies or who refuse the offer of employment, or if there is no vacancy at the time of sending the data, will be retained for 6 months or 6 months after the end of the recruitment process, unless you have indicated that you wish to keep your personal data for a period of 3 years.

5. Recipients of your data

Recipients of your data may be employees of the departments "Human Resources", "Marketing" and "Information Technology at Acibadem City Clinic EAD. Apart from these persons, your personal data may be provided to employees of other medical institutions in the Acibadem City Clinic group in accordance with the purposes for which the data were collected.

6. The controller will transfer your personal information to third parties only if:

You have given your explicit consent in accordance with Article 6 (1), sentence 1 (a) of the GDPR;

The transfer is legally admissible and necessary for the performance of the contractual relationship with you in accordance with Article 6 (1) , sentence 1 (b) of the GDPR;



If there is a legal obligation to transfer data under Article 6, paragraph 1, sentence 1 , letter c) of GDPR.

7. Automated decision making

We do not make automated decisions, including we do not profile you based on personal data provided by you for the above purposes.

8. Your rights

1. Right of access to the processed personal data;
2. Right to correct /update your personal data;
3. Right to object to the processing of personal data;
4. Right not to be the subject of a separate decision on the sole basis of the processing of personal data by automated means;
5. Right to contact the Commission for Personal Data Protection;
6. Right to request the deletion or termination of data processing;
7. The right to request to portable your data to another controller.

This document has been updated as of March 31, 2021.