

External Data Protection Notice of HermannOrtho Professional Orthodontics: on the website

Neurotrain Plus Ltd. (registered office: 1089 Budapest, Benyovszky Móric u. 6., company registration number: 01-09-931566, tax number: 11719757-2-42, phone: +36 1 306 78 46, e-mail: info@hermannortho.hu, represented by: Dr Gábor Hermann and Dr. Hermann-né Vrbica Nelly (Managing Directors) as Controller hereby informs concisely and briefly data subjects other than its employees of the data processing activities conducted by it.

The Controller calls the data subjects' attention to the fact that data subjects may request information and exercise their rights (right to rectification, right to erasure, right to be forgotten, right to blocking/restriction, right to object) – provided that it is not excluded by law – by sending their statement to info@hermannortho.hu or to another address of the Controller, and they may refer any breach of their rights to the authority (Hungarian National Authority for Data Protection and Freedom of Information at www.naih.hu) or the court.

More detailed explanations of the different data processing operations are included in the Internal Data Protection Notice.

One-off request for information

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Providing relevant information to and keeping contact with data subjects	Freely given consent	All natural persons who contact the Controller and request information from the Controller while providing their personal data	See below	Until the purpose is fulfilled or upon expiry of the limitation period	Done electronically and/or on paper, manually	Data subjects

Data processed in the course of uninterrupted, regular contacts with data subjects

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Keeping contact with data subjects, answering/solving questions asked, requests and others made, marketing/sales activities	Freely given consent or contract concluded (Article 6(1)b) of GDPR)	All natural persons, including also natural persons acting for and on behalf of an organisation who, beyond a one-off request for information, keep uninterrupted or regular contact with the Controller	See below	Until a request for erasure is received, or the purpose is fulfilled, or there is no more interest in keeping such data	Done electronically and/or on paper, manually	Data subjects

Making appointments/checking in the office

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Giving appointment to and keeping contact with data subjects	Based on freely given consent	All natural persons with whom the Controller makes an appointment	See below	If it relates to data concerning health: until the applicable deadline, otherwise for 5 years	Done electronically and/or on paper, manually	Data subjects

Data processing related to requesting and giving quotations

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Providing relevant quotation to and keeping contact with data subjects	Freely given consent	All natural persons who request a quotation from the Controller and provide their personal data	See below	During the validity period, for 6 months thereafter for legitimate interest, or if accepted, until the contract expires, unless an accounting document is issued, in such cases for 8 years	Done electronically and/or on paper, typically on paper, manually	Data subjects

Data processing related to a statement of consent/conclusion of a contract

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Identification of the data subject, providing relevant services to data subjects in accordance with the statement of consent/ provisions of the contract, and keeping contact	Concluding a contract (Article 6(1)b) of GDPR), statutory or freely given consent	All natural persons who provide the Controller with a statement of consent/ sign a contract with the Controller – and provide their personal data – in relation to using a service	See below	Data concerning health: at least 30 years, discharge report: at least 50 years, images taken by diagnostic imaging procedures: 10 years of their taking, the diagnosis made based on such image: 30 years of taking the image To underlie accounting documents: At least 8 years pursuant to Section 169(2) of Act C of 2000	Done electronically and/or on paper, manually	Data subjects

Data processing related to data and documentation concerning health

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Identification of the data subject, providing relevant services to data subjects in accordance with the statement of consent/ provisions of the contract, and keeping contact	Concluding a contract (Article 6(1)b) of GDPR), statutory or freely given consent	All natural persons who provide the Controller with a statement of consent/ sign a contract with the Controller – and provide their personal data – in relation to using a service	See below	Data concerning health: at least 30 years, discharge report: at least 50 years, images taken by diagnostic imaging procedures: 10 years of their taking, the diagnosis made based on such image: 30 years of taking the image To underlie accounting documents: At least 8 years pursuant to Section 169(2) of Act C of 2000	Done electronically and/or on paper, manually	Data subjects

Data processing related to the registration of customers

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Registering the customers of the Controller, facilitating smooth contact-keeping,	Freely given consent or based on contract	All natural persons and representatives of non-natural persons who are or intend to be the	See below.	See below.	Electronically, manually	Data subjects, Sales Department

following up with steps taken		Controller's customers				
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Images taken, video recordings, voice recordings made – for example when using a service – of the data subjects with their consent

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Purpose specified in the data subject's consent	Freely given consent	All natural persons who grant consent in advance to taking image, or making video and/or voice recordings of them	See below.	Until erased upon the data subject's request	Done electronically and/or on paper, manually	Data subjects

Claims/complaint handling

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Identification of the data subject and the complaint, as well as complaint handling and contact-keeping	Starts with the freely given consent, but data processing is a statutory requirement	All natural persons who intend to make a complaint about a service and/or the Controller's conduct, activity or omission, orally or in writing	See below.	The Controller keeps the records on complaints and the copies of the responses during the limitation period (5 years) from taking such records	Done electronically and/or on paper, manually	Data subjects, rarely Partners

Data processing related to statements of consent

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Proving the legal basis for data processing, and satisfying the consent (accountability principle) and contact-keeping	Freely given consent	All natural persons who give the Controller a statement of consent to processing their data for any purpose	See below.	Until the expiry of the limitation period or erasure	Electronically and/or on paper, manually	Data subjects

CCTV operation

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Purposes specified in the CCTV Regulation, e.g. protection of property, persons and physical integrity, etc.	The Controller's legitimate interest	All natural persons who enter or stay in areas under CCTV surveillance	See below	Pursuant to Section 31(2) of Act CXXXIII of 2005 3 business days of recording (if not used), in special cases 30 days	Done electronically, automatically	Data subjects

Questionnaire, evaluation system

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source

Improving service quality, investigating complaints, if any, and contact-keeping	Based on freely given consent	All natural persons who used the Controller's services and evaluated them for the purpose of quality improvement and/or giving feedback	See below	Until the purpose is fulfilled	Done electronically and/or on paper, manually	Data subjects
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Sending a newsletter

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Improving service quality, investigating complaints, if any, and contact-keeping	Based on freely given consent	All natural persons who wish to be regularly informed of the Controller's news, campaigns and discounts and to this end subscribed to the newsletter while providing their personal data	See below	Until unsubscribed	Subscription electronically or on paper, manually Automated electronic sending Unsubscribing electronically or on paper, manually	Data subjects

Marketing on social media

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Controller's marketing	Freely given consent	All natural persons who voluntarily follow, share or like the pages and the contents displayed on the Controller's social media pages, in particular on facebook.com	See below.	Until erased upon the data subject's request	Done electronically manually	Data subjects

Organizing prize competitions

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Identification of data subjects upon the prize draw and contact-keeping	Freely given consent	All natural persons, including natural persons representing an organisation, who intend to participate and give their data in a prize competition organised by the Controller	See below.	Until the expiry of the limitation period or for at least 8 years pursuant to Section 169(2) of Act C of 2000	Done electronically manually	Data subjects

Data processing related to banking data and money transfers

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Facilitation and verification of financial performance	Fulfilling a legal obligation and/or contracting	All natural persons to whom the Controller transfers money, and all natural persons who wish to discharge their financial obligations through bank transfer towards the Controller	See below.	Until the expiry of the limitation period or for at least 8 years pursuant to Section 169(2) of Act C of 2000	Done electronically and/or on paper, manually	Data subjects

Processing the data of job applicants, including CVs sent for unadvertised jobs

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Application, contact-keeping	Freely given consent	All natural persons who apply for a job advertised by the Controller or apply	See below.	For 6 months for legitimate interest, for the duration specified in the consent or until	Electronically and/or on paper, manually	Data subjects

		without a job opening advertised		the fulfilment of the data subject's request for erasure		
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Processing the data of own employees

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Fulfilling the statutory requirements	See below the laws, legitimate interest, agreement, freely given consent	Employees	See below.	See below.	Electronically and/or on paper, manually	Data subjects

Processing the data of own employees: data processing at company trainings and handling documents proving the qualifications acquired

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Discharging statutory obligations, proving professional qualification, and on the other hand following up with the employees' trainings and facilitating their improvement	Law or legitimate interest of the Controller	Employees	See below.	See below.	Electronically and/or on paper, manually	Data subjects

Processing the data of own employees: Data processing related to images, video recordings and voice recordings of employees

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Purpose specified in the data subject's consent	Freely given consent	Employees	See below.	Until erased upon the data subject's request	Electronically and/or on paper, manually	Data subjects

Processing the data of own employees: processing data related to reduced capacity to work

Purpose	Legal basis	Data subjects	Category of data	Duration	Means	Source
Discharging legal obligations related to occupational health and safety, and to providing evidence in investigative proceedings of authorities	Discharging legal obligations	Employees	See below.	Until the submission of the document under the supervisory review, and until the expiry of the limitation period open to verifying tax benefits	Electronically and/or on paper, manually	Data subjects

Schedule to the Internal Data Protection Regulation of HermannOrtho Orthodontics

Data Processors and Providers

With reference to the provisions of the Internal Data Protection Regulation, the Data Controller hereby notifies and informs all those concerned that the Controller's Data Processors:

A. Accounting:

Name: **FairConto Zrt.**

Address: 1097 Budapest, Könyves Kálmán krt. 12-14.

Company registration number: 01-10-046157

Tax number: 14448043-2-43

Represented by: Kovács Kornél

B. Web storage:

Name **Szalai Ernő Róbert EV**

Address: 8295 Taliándörögd, Tavasz utca 2.

Tax number: 55754194-1-39

Registration number: 54480966

C. Healthcare:

Name: **Doktor24 Medicina Zrt.**

Address: 1134 Budapest, Váci út 37. 1. em.

Company registration number: 01-10-140606

Tax number: 27277210-2-41

Represented by: Lancz Róbert György

Contact person: dr. Papp Dániel

D. Occupational safety and Fire safety:

Name: **Hermann Péter**

Address: 1046. Bp. Erdősor u. 20. I./14.

Tax number: 68037736-2-41

Registration number: 51129363

Represented by: Hermann Péter

E. Office management software provider :

Name: **Flexi Medical Hungary Kft.**

Address: 1027. Budapest, Tölgyfa utca 28.

Company registration number: 01-09-991891

Tax number: 24131140-2-41

Represented by: Friss Tamás

Date: 01/March/2021

Dr. Gábor Hermann
Hermann Dental And Medical Ltd.