

## Privacy Policy

This Privacy Policy has been prepared in accordance with the recommendations of EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, "GDPR").

### 1. Introduction

Dr. Sápi Dent Kft. Dental Clinic (registered office: 1016 Budapest, Zsolt utca 9. ground floor 7.; company registration number: 01 09 400464; email: adrienn.drsapi@gmail.com; phone: +36 70 200 5600; represented by Dr. Adrienn Sápi, Head of Clinic) acts as Data Controller in respect of all personal data it processes.

### 2. Legal Background

This Privacy Policy is based on:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR),
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information,
- Act XLVII of 1997 on the Management and Protection of Health and Related Personal Data,
- Act CLV of 1997 on Health,
- Act XLVII of 2008 on the Prohibition of Unfair Commercial Practices against Consumers,
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.

### 3. Purpose of the Policy

The purpose of this Policy is to ensure that data subjects are informed in a concise, transparent, intelligible, and easily accessible form, using clear and plain language, about how their personal data are processed.

The Data Controller shall also facilitate the exercise of data subjects' rights in accordance with the GDPR.

#### 4. Data Controller

Name: Dr. Sápi Dent Kft.

Registered office: 1016 Budapest, Zsolt utca 9. ground floor 7.

Company registration number: 01 09 400464

Health Authority license number: BP-02/NEO/00718-8/2025

Responsible person: Dr. Adrienn Sápi

Phone: +36 70 200 5600

Email: adrienn.drsapi@gmail.com

#### 5. Data Processors

The Clinic maintains a Data Processor Register listing all third parties that process personal data on its behalf.

This register is available for inspection at the Clinic.

#### 6. Data Processing Related to Health Data and Documentation

The Clinic may collect, record, store, and process the data subject's health information and documentation

(e.g. X-rays, medical records, examination results) for the purpose of providing professional dental care.

Such data are processed to support diagnosis, treatment planning, and patient management.

Data retention periods are defined in accordance with Section 30(1) of Act XLVII of 1997:

- medical documentation: at least 30 years,
- discharge summaries: at least 50 years,
- diagnostic imaging: 10 years from creation,
- reports based on imaging: 30 years from creation.

#### 7. Rights of Data Subjects

Data subjects have the following rights under the GDPR:

- Right to transparent information and communication
- Right of access
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to data portability

- Right to object
- Right not to be subject to automated decision-making or profiling
- Right to lodge a complaint with a supervisory authority (National Authority for Data Protection and Freedom of Information, [www.naih.hu](http://www.naih.hu))

## 8. Contact and Complaints

If you have any questions or requests concerning this Privacy Policy, or wish to exercise any of your rights,

please contact:

Dr. Sápi Dent Kft.

Email: [adrienn.drsapi@gmail.com](mailto:adrienn.drsapi@gmail.com)

Phone: +36 70 200 5600

Address: 1016 Budapest, Zsolt utca 9. ground floor 7.