

Privacy Policy

Approved on November 1, 2020, last updated on September 8, 2023.

Medon SIA, with registration number 41203073671 and legal address at Jūrmala, Pērkona iela 3 - 1, LV-2010, and websites <https://medon.io> and <https://medon.lv> (hereinafter referred to as "**Medon**" or "**We**") is the controller for the processing of personal data.

We have developed this privacy policy (hereinafter referred to as the "**Privacy Policy**") to provide you with information on:

- why We process personal data;
- how We process personal data;
- the rights of individuals whose data We process.

Our goal in publishing this Privacy Policy is to ensure that our processing of personal data is transparent, clear, and fair.

This privacy policy applies to:

- data that individuals themselves have provided to us;
- data that We obtain from third parties.

Contacting us

If you have any questions about this Privacy Policy, e.g., on why and how We process your personal data, or requests related to the Privacy Policy, please contact us by email at dpo@medon.lv.

To find out more about our processing of personal data, please refer to the information provided below.

Introduction

This privacy policy describes our attitude and responsibility towards the information We collect about you or that you receive when you visit our websites <https://medon.io> or <https://medon.lv> (hereinafter referred to as the "**Website**"). This privacy policy applies to services provided to you by Medon.

We have taken the necessary technical and organisational measures to ensure the security of personal data, which ensures the protection of your personal data from accidental disclosure, alteration, or other illegal processing.

We intentionally do not collect, use, or disclose personal information about identifiable individuals under the age of 14 in the case of website <https://medon.lv> and under the age of 18 in the case of website <https://medon.io>, except as required by law. We may transfer and store your data in countries within the European Union and/or the European Economic Area, but We do not transfer your data to countries outside these regions unless We have obtained your consent or unless it is necessary for the performance of a contract or for legal reasons.

Only by visiting the Website and not submitting information through forms, identifiable or identifiable personal data is not collected, but cookie collection takes place according to the "Cookies" section of this privacy policy.

Any submitted, collected, and received personal data will be processed only for the stated purpose and to the extent necessary to achieve the goal. Information will be provided about the specific data being transmitted and, if necessary, consent will be obtained in accordance with the General Data Protection Regulation and other documents regulating data processing.

This privacy policy may be amended. The current version of the policy is available on our Website.

The legal basis for processing data

We process your personal data only if one of the following applies:

- Obtained your consent;
- Realisation of our legal (legitimate) interests;
- Conclusion or performance of a contract;
- Compliance with legal obligations.

Data processing is carried out for the purpose of providing (1) healthcare services in the case of <https://medon.lv> and (2) second medical opinions that are not considered healthcare services on <https://medon.io>. Data processing is necessary for us to provide you with high-quality services, to fulfil the contract We have concluded with you, to fulfil our legal obligations applicable to us, and it may be necessary for preventive or occupational health purposes, assessment of the work capacity of an employee, medical diagnosis, healthcare or treatment, or management of healthcare systems and services. In certain cases, We may process data to ensure our and third parties' legitimate interests.

At the same time, in certain cases, We are entitled to authorise a third party to process your personal data. Please note that We will only disclose your personal data to third parties if:

- We have concluded a contract with the recipient of your personal data and have ensured the implementation of the appropriate requirements for the transmission and receipt of personal data;
- We are legally required to disclose your personal data to the relevant recipient (e.g., an institution or insurance company).

What personal data do We process?

The categories of personal data We process depend on the services you receive.

When you receive healthcare or second medical opinion services, in accordance with regulatory requirements, We are obliged to process your identifying information and information that confirms your diagnosis, justify tests and treatment methods, and accurately reflect treatment results. In order to achieve the goal of providing healthcare, We may process the widest possible range of personal data, including name, surname, personal code, contact information, address, information about diseases suffered and information about received healthcare services (who the doctor is, how often, what services are chosen) and other information that the relevant

healthcare specialist will choose to find out and record in the system of the Website in the particular situation.

When you contact us, the content of the communication may be preserved, as well as information about the communication tool used, which may include, for example, your email address and phone number.

We process data on the history of Website usage using online identifiers, as well as information you have deliberately left, such as your evaluation of the quality of our services.

1. Provision of the service

We process your personal data every time you want to receive or receive a service using our Website.

The legal basis for this processing of your data is the conclusion and performance of a contract, as a contractual relationship is established between you and us — the provision of services.

2. Consumer rights

We also process personal data to realise consumer rights, for example, to review your complaints about services provided to you or to improve the quality of our services.

The legal basis for this processing of your data is the fulfilment of legal obligations.

3. Patient rights

We also process personal data to realise patient rights, for example, to enable you to access your health data, to justify the visit or cancellation, communication with a doctor, and other information stored in our Website system.

The legal basis for this processing of your data is the fulfilment of legal obligations.

4. Marketing and commercial notices

We process your personal data to carry out various marketing activities, such as informing you of our offers.

In order to send you interest-based advertising materials, discounts or other special offers, to which you have given your consent, We process your name, surname, email address, telephone number, and Website visit history information.

We would like to inform you that consent is not the only basis for sending you commercial messages. The second part of paragraph 9 of the Information Society Services Law also provides for cases where commercial messages may be sent without obtaining consent, for example, if the email address has been obtained in the context of a transaction.

You can always **opt out of receiving such messages** by sending a request to stop the communication to an email address.

What data processing do We do?

The categories of personal data that We process depend on the services you receive.

When you receive health care services, in accordance with regulatory requirements, We are obliged to process your identifying information and information that confirms the diagnosis, justifies the examination and treatment methods, and accurately reflects the treatment results. In order to fulfil the goal of providing health care, We may process the widest possible amount of personal data, which includes name, surname, personal code, contact information, lifestyle, information on the diseases suffered, information on the health care services received and to be received (by which doctor, how often, which services are chosen), and other information that the relevant health care specialist will choose to find out and record in the medical documentation in the specific situation.

When you visit our regional centres or central office, your video image and the time of your visit to the premises may be processed. Video surveillance is not carried out in rooms where you might expect increased privacy, and informative labels are placed in the places where video surveillance is carried out.

When you contact us, the content of the communication may be saved, as well as information about the communication tool used, which may include, for example, your email address and phone number.

We process the history of Website usage data by using online identifiers, as well as the information you intentionally leave, such as your evaluation of the quality of our services.

Information collection

In order to provide information and services, We collect information in the following ways:

Directly from you:

- providing the opportunity to fill out a registration form on our Website;
- making online lists using phone, email or other technical tools and communication channels.

Automatically:

- technical information that may contain your IP address, device data, software data, and other data;
- social network information and content that may contain identification and social account data;
- cookies (more information in the "Cookies" section).

Receiving from third parties:

- publicly available resources (social networks, public registers); our partners and affiliated companies.

Use and disclosure of information

In order to receive the services indicated on the Website or for other business purposes of the company, you may need to provide us or our service providers with information to the extent necessary for the specific purpose.

We may use information about you to:

- maintain your user profile;
- verify your identity;
- process applications received from you;
- perform business analysis, statistical measurements, market research and evaluate the quality of our operations, services, and products;
- ensure and improve the quality of service;
- develop and offer new services to you;
- maintain and test our Website and make necessary improvements to it;
- communicate with you about the services provided and new services that may be of interest to you and inform you of changes in services and contractual relations;
- offer you other services and products of Medon, our group companies and/or third parties;
- advertise (on Websites and mobile services, by mail, email, phone, or SMS) products and services of Medon, other group companies or third parties, including tailoring them to your personal preferences;
- receive appropriate commercial and non-commercial notifications;
- identify and prevent any criminal activity, including money laundering, terrorist financing, and other criminal financial activities;
- fulfil obligations arising from regulatory requirements;
- use in any other lawful manner.

Before disclosing data, we require data recipients to observe and take the technical and organisational measures necessary for data protection, data storage and processing security.

Exchange and disclosure of information

We may disclose your personal data to our cooperation partners for the following purposes:

- to identify you, by disclosing your Personal data to relevant state and commercial institutions;
- for the purpose of offering and developing new services;
- to cooperation partners — service providers, such as Website maintainers, marketing service providers, etc.;
- to identify, investigate, and prevent any money laundering and terrorist financing activities, as well as any fraudulent activities;
- to exchange with other service providers, your personal data that We have obtained or that you have provided to us, using the services offered on our Website;
- for statistical and any other research purposes;
- in the context of legal research;
- in cases provided for in regulatory acts.

From third parties for our purposes, We may request and obtain:

- search for information about you;
- information from financial and payment institutions, including banks;
- information from our group companies;
- information from our partners involved in payment, technical, or service provision;
- information in any other case where you have given us your consent or there is another legal basis.

To ensure that our content, services, and news are relevant to you and audience similar to you, We may collect information from and about you to evaluate your potential interests.

If the information received from or about you does not identify you as a physical person and is used in a pseudonymised, anonymous, or otherwise non-identifiable manner, We may use it for other purposes, including disclosing it to third parties.

This Website uses Mouseflow: a website analytics tool that provides session replay, heatmaps, funnels, form analytics, feedback surveys, and similar features/functionality. Mouseflow may record your clicks, mouse movements, scrolling, form fills (keystrokes) in non-excluded fields, pages visited and content, time on site, browser, operating system, device type (desktop/tablet/phone), screen resolution, visitor type (first time/returning), referrer, anonymized IP address, location (city/country), language, and similar metadata. Mouseflow does not collect any information on pages where it is not installed, nor does it track or collect information outside your web browser. If you'd like to opt-out, you can do so at <https://mouseflow.com/opt-out>. If you'd like to obtain a copy of your data, make a correction, or have it erased, please contact us first or, as a secondary option, contact Mouseflow at privacy@mouseflow.com.

For more information, see Mouseflow's Privacy Policy at <https://mouseflow.com/legal/company/privacy-policy/>

For more information on Mouseflow and GDPR, visit <https://mouseflow.com/legal/gdpr/>.

For more information on Mouseflow and CCPA/VCDPA visit <https://mouseflow.com/legal/ccpa>.

Data Subject Rights

You have the right **to be informed** about the purposes of data processing, the scope of the data and the expected processing activities before any data transfer, as well as to **agree or disagree** with such data processing that cannot be carried out without your free consent. Such information will be provided on the Website before you submit any data.

You have **the right to request and receive information** about your personal data processed by us, what information We process, why We process it, and to whom We disclose your personal data.

We will try to fulfil your request as soon as it is practically possible. Please note that you have the right to free access to the aforementioned information, but not more than twice a year. In the event that you request the above information about your personal data more frequently, We will provide it to you for a fee, the amount of which will cover the costs incurred by us in providing this information.

You **have the right** to request at any time that We **correct and update** any inaccurate data in our possession.

You **have the right** to object to the continuation of data processing or to restrict the processing of your personal data, as well as to **withdraw your prior consent** to data processing.

You **have the right to request the deletion of your personal data**. Please note that We will only be able to delete your personal data in cases where We do not have a binding obligation to retain your personal data for certain purposes specified in the law.

You have **the right to opt out of receiving our commercial and non-commercial notifications**, by selecting "Opt Out of Further Messages" in any notification received. If you continue to receive our notifications after opting out, please let us know at the aforementioned email address so that We can resolve the situation.

You have **the right to request the transfer of your personal data and receive copies of your personal data** provided and processed on the basis of consent and contract, in written form or in one of the most commonly used electronic formats. If technically feasible, We can transfer your personal data to another service provider at your request. In certain cases, this can be done by the data subject themselves in an automated manner in the online account section "Profile" of the Website.

You have **the right to submit complaints about the processing of personal data**. If you believe that our processing of personal data violates your rights, you can at any time submit a complaint to us by sending information to our contact person or by addressing us personally.

We will consider your complaint immediately and provide a response within the timeframes specified by law. The data subject can exercise their rights by writing to our contact person at the email address: dpo@medon.lv, unless We can justify the processing of your personal data with our legitimate interests or our rights to defend our legitimate claims.

To ensure the appropriate processing of personal data, you also have the right to submit a complaint to the Data State Inspectorate:

- by sending your complaint to the following email address: info@dvi.gov.lv; or
- by personally addressing the Data State Inspectorate at Elijas iela 17, Riga, LV-1050.

Retention of personal data

All personal data obtained from you is stored for as long as you use our services, or until you withdraw your consent if your personal data is processed on that basis. A longer period of personal data retention is permitted in order to fulfil legal requirements for the minimum retention period of documents or information or to protect our legitimate interests.

Once this period has ended, We will securely delete your personal data or make it inaccessible (archiving), or anonymize it so that it can no longer be associated with you.

The duration of personal data retention may be justified by our mutual contract, our legitimate interests, or applicable regulatory acts that We must comply with.

For your information, if as a data subject you exercise the rights provided for in the General Data Protection Regulation or object to profiling performed, We reserve the right to request additional information from you in order to identify you and fulfil your request. We will fulfil your request, in providing healthcare services, We comply with special regulatory acts that determine the obligation to retain certain data. If you would like to obtain detailed information, please contact us.

Profiling and Automated Decision-Making

Profiling is the automatic processing of personal data that We use to evaluate certain customer characteristics, particularly to analyse or predict, for example, your interest in a specific product or event from our company.

We use profiling for direct marketing purposes, in order to create special offers for the customer, including organising customer events. We do not make automated decisions.

You can use your data subject rights and object to profiling by writing to our email address: dpo@medon.lv.

Cookies

A cookie is a small text file that is stored on your device. The purpose of cookies is to recognise the device you are using to access our Website.

We store cookies as long as you use our services or until you withdraw your consent.

We and our partners use cookies to:

- protect our customers and prevent fraudulent activities;
- learn how users access our Website and study how they use it in order to improve the quality of the services We provide;
- monitor and manage Website data traffic;
- improve the quality of the Website;
- offer you tailored commercial and non-commercial messages.

We use two types of cookies:

- session (temporary) cookies that are deleted when you close or leave the Website;
- persistent cookies that remain even after the browser is closed and can be used again when you return to the Website.

Our Website cookies may be used by third-party analytics and online commercial message technical platform providers (such as Google, Facebook, and others) to display commercial messages to you based on your browsing history. You can opt out of the use of these cookies by visiting the settings page on the Website of the respective provider.

If you want to limit or block cookies on our Website or any other Website, you can do so by changing your internet browser settings. For example, you may have the option to block all cookies, accept only first-party cookies, or delete all cookies when exiting the browser.

Please note that some of our services may not function if you block or delete cookies.

Links to Other Websites

Our Website may contain links to other third-party websites. Each website has its own privacy policy. If you visit these third-party websites, they will be subject to their privacy policies. We do not control and are not responsible for the content, privacy policy, and practices of third-party websites or services.

Changes to Privacy Policy

From time to time, We may update our privacy policy, so We recommend reviewing this Website periodically. We will notify you of any changes by posting the updated privacy policy on this Website and sending you a notification to the email address you provided. These changes are effective immediately after they are posted on the Website.