

PRIVACY POLICY

Foundation for the Study of Nanoneuroprotection and Neuroregeneration

I. General particulars

The content of the website www.roneuro.ro (hereinafter referred to as the *Site*) is the exclusive property of the Foundation for the Study of Nanoneuroprotection and Neuroregeneration (hereinafter the *Owner* or the *Institute*) with its headquarters in Mircea Eliade Street no. 37, 400364, Cluj-Napoca, Civil closure: 1737/CC/2008 updated 12630/CC/2013, having the tax code RO 24218089.

As a data operator, the Owner constantly monitors and ensures that the processing of personal data strictly complies with the principles and legislation regarding the protection of personal data, in particular the provisions of Law no. 677/2001 regarding the protection of individuals with regard to the processing of personal data and the free movement of such data and Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and the free movement of these data and repealing of Directive 95/46/EC (hereinafter "GDPR").

This Privacy Policy is valid as of May 25, 2018 and is intended to inform you about:

- the activities of processing your personal data, as a visitor of the Site or as a user of the functions within the Site;
- the processing of the personal data carried out by the Owner, in order to carry out his activities according to those described below.

The institute may update this Privacy Policy at a later date, in which case it will inform the data subjects through the Site of any changes before they become applicable.

II. Definitions

"Personal data" means any information about an identified or identifiable natural entity ("data subject"); an identifiable person is a person who can be identified, directly or indirectly, in particular by reference to an identification element, such as a name, identification number, location data, an online identifier, or to one or more specific elements, specific to its physical, physiological, genetic, psychological, economic, cultural or social identity.

"Referring doctor" means the doctor who recommended/enrolled in the medical referral to perform certain laboratory investigations/analyses.

"Direct patient" means the patients who come to the reception of the Institute, either directly payers, or the patients who request to perform analyses settled by the Health Insurance House ("CAS").

"Processing" (and its derivatives, including without limitation "processing") means any operation or set of operations performed on Personal Data, including without limitation the collection, registration, retention, modification, use, disclosure, access, transfer or destruction them.

"Visitor" - any person who accesses or uses the Website.

III. Categories of Personal Data processed

The categories of Personal Data processed depend on the context of the interactions and relationships you have with the Owner, respectively in relation to the interactions with the Site. Thus, the Owner could process the following Categories of Personal Data:



1. In the case of **Site visitors** - depending on your interaction with the Site, the following categories of Personal Data could be processed:
 - (i) in the case of Programming Forms, suggestions, requesting additional information, contact and/or complaints: last name, first name, e-mail address, age, telephone, street, gender.
2. In the case of **candidates for employment**: last name, first name, e-mail address, telephone number, job/position, city, CV (which may include, inter alia, the following data in addition to those mentioned above, respectively: image, vocational training, information on the current job).
3. For people wishing to access the volunteer program of the Institute, more details here (https://www.roneuro.ro/en/images/Legal/Volunteering_Regulation.pdf)
4. In the case of persons contacting the Institute through the **Call Center**, other telephone numbers displayed on the Site or by other means of distance communication, belonging to the Owner, in the context:
 - (i) The schedules for the outpatient services/laboratory analyses settled by CAS, the following Personal Data can be processed: last name, first name, PNC, quality of insured, information on medical reference, date of birth, telephone number.
 - (ii) The schedules by phone of the directly paying Patients, the following Personal Data can be processed: last name, first name, information on the medical reference, telephone number.
 - (iii) The requests, complaints and phone suggestions, as well as those sent by other remote means, the following personal data can be processed: last name, first name, address, phone and e-mail address.

IV. Purposes and grounds of Personal Data Processing

Personal Data regarding the categories of data subjects mentioned in section III above, voluntarily provided on the occasion of developing the relations with the Owner, creating the web account, requesting offers, filling the online forms, improving the services or provided by them in otherwise through the use of the Site or in relation to the Institute

they may be processed by the Institute directly and/or through the authorized persons, for the following purposes:

1. In order to conclude and execute the agreements, for the following purposes:

1.1. In order to conclude the agreements - in the context of the data processing for the telephone appointments requested by the Direct patients or by other means of remote communication (*see point III.7. (i), (ii) above*);

The legal basis of these processing activities is the conclusion, respectively the execution of the agreement.

2. In order to accomplish the legitimate interests of the Owner in the context of carrying out its object of activity:

2.1. In order to improve the services (such as requesting feedback), managing the requests/complaints received from you, customizing the services at the request of the data subject and presenting the necessary analyses - in the context of the data processing of the **site visitors**;

2.2. In order to provide the requested medical services and to transmit the results of the medical investigations and analyses to the **Patients**;

2.3. For the purpose of transmitting the results of the medical analyses online to the **Doctors (if there are requests)**;

2.4. For recruitment purposes - in the context of data processing of **candidates for employment/volunteer program**;

2.5. For the purpose of managing schedules, complaints, suggestions or any telephone requests;

The legal basis of these processing activities is the legitimate interest of the Owner to improve their services, to handle the requests/complaints received and to adapt the necessary services to each interested person, to provide the healthcare services, the management of the medical systems and services, staff recruitment, respectively.

V. Cookie files

Together with many other website operators, we may use standard technology called "cookies" on this site. Cookies are small pieces of information stored by your browser on your computer hard disk. Our cookies allow us to identify you and store information about the services you use during your visits. Most browsers automatically accept cookies, but you can usually change your browser to prevent cookies from being stored. However, if you disable cookies, this will limit the service we can provide. Make sure your browser cookie settings are the way you want them to be.

VI. Recipients of Personal Data

To achieve the processing purposes, the Owner may disclose certain categories of Personal Data to the following categories of recipients: the data subject and/or his legal representatives, the representatives of the Institute, the entities of the Group to which the Owner is a member, the contractual partners (such as, collaborating laboratories, payment processors), including proxies, court authorized persons or other public authorities of any kind, international organizations, service providers and asset suppliers, professional organizations and market research organizations.

VII. Period of Processing the Personal Data

The Owner will process your Personal Data for the duration of processing purposes and subsequently in accordance with our internal policies, as well as in order to comply with the applicable legal obligations, including, but not limited to, the provisions regarding the archiving obligation

It is possible that, following the accomplishment of the legal archiving deadlines, the Owner may order the anonymization of the data, thus depriving them of their personal character and to continue processing the anonymous data for statistical purposes.

In the event that the patient who has an active web account wants to close/delete the account, it will not be automatically deleted nor has the effect of automatically deleting his Personal Data from the account by pressing the "Delete Account" button, but this request for deletion will be resolved by the Institute within a maximum of one month from the date of registration of the application, according to the applicable legal provisions.

VIII. Security of Personal Data

The owner pays a high importance to the confidentiality and security of your Personal Data and understands to ensure their security during the processing activities of this Privacy Policy. In this respect, the Owner implements appropriate technical and organizational measures to ensure a level of security appropriate to the risks associated with the types of data processed and the processing operations.

The website of the Institute may contain links to other websites. We have no control over and are not responsible for the content, privacy policies or security of these sites. We recommend that you check the privacy and security policies of each site you visit.

IX. Provision of Personal Data

The provision of Personal Data may be a contractual obligation or an obligation necessary for the conclusion/execution of an agreement, may be necessary in order to benefit from the services provided by the Institute, to browse the Site and to benefit from the facilities offered on this space. In some cases, the refusal to provide Personal Data may result in the impossibility of receiving the services made available through the Website (for example, the

impossibility of making an online schedule). For direct marketing activities, the provision of your data is voluntary.

Although the Institute requires the agreement for the processing of certain Personal Data, this agreement may not always be required by law. In such situations, the Owner may use other grounds for data processing, such as the provision of medical services, performance of the agreement or legitimate interest.

X. Rights of the Data Subject

With regard to the processing of Personal Data indicated in this Privacy Policy, each data subject benefits from the following rights, according to the applicable legal provisions:

(A) **the right to information** - the right to receive a minimum content of information regarding the processing activities carried out by the Owner, in accordance with the legal requirements;

(b) **the right of access to data** - the right to obtain from the personal data operator, at the request and under the conditions established by the legislation, the confirmation of the fact that the data concerning it are processed or not by the personal data operator, as well as details regarding the processing activities;

(c) **the right to intervene on the data** - the right to obtain from the personal data operator, upon request and free of charge: (i) where appropriate, rectifying, updating, blocking or deleting data whose processing is not in accordance with the law, in particular incomplete or inaccurate data; (ii) where applicable, the transformation into anonymous data of data whose processing is not in accordance with the law; (iii) notification to third parties to whom the data were disclosed, of any operation performed according to letter (i) or letter (ii) if such notification does not prove impossible or does not involve an effort disproportionate to the legitimate interest that could be harmed;

(d) **the right of opposition** - the right to oppose at any time, for well-founded and legitimate reasons related to its particular situation, as data aimed at it being processed, unless

otherwise provided by law; Regarding the direct marketing activities, the data subjects have the right to oppose this processing at any time.

(e) **the right not to be subjected to an automatic individual decision** - the right to obtain human intervention on such a decision, the right to express the view on such a decision and to challenge the decision;

(f) **the right to address the justice** for the defense of any rights guaranteed by the legislation in the matter, without prejudice to the possibility **of addressing with complaint the National Supervisory Authority for the Processing of Personal Data.**

Starting with May 25, 2018, when the GDPR becomes applicable, the data subjects also enjoy the following rights:

(a) **the right to restrict processing** to the extent that the conditions provided by law are accomplished;

(b) **the right to data portability**, respectively (i) the right to receive personal data in a structured, commonly used and easy-to-read format, and (ii) the right to have such data transmitted by the Institute to another data operator, to the extent that the conditions provided by law are accomplished;

(c) **the right to withdraw consent** when processing is based on it;

(d) **the right to delete the data** ("the right to be forgotten") insofar as the conditions provided by law are accomplished;

At the same time, in the case of data transfers outside the EEA (the "European Economic Area"), the data subjects whose Personal Data are the subject of the transfer, may ask the data operator for information on the transfer guarantees.

In order to exercise the rights mentioned above, you can apply with the following contact details:

- Address: Mircea Eliade street no.37, Cluj-Napoca, Romania
- E-mail: receptie@roneuro.ro

Also, the processing of Personal Data is monitored and supervised by the Data Protection Officer, having the following contact data:

- Tel.: 0374.461.652
- E-mail: dpo@ssnn.ro

We only accept written requests, because we cannot handle verbal requests immediately, without first analyzing the content of the request and without first identifying you.

Your application must contain a detailed and accurate description of the right you wish to exercise.

If you write to us by email/mail, please indicate your last name and first name to identify and respond appropriately to your request, or by sending the request to the email address specified above.

National Supervisory Authority for Personal Data Processing

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