HOW WE PROCESS PERSONAL DATA AT INVICTA GROUP COMPANIES

Acting as the Controller of your personal data, we are hereby asking you to read the information necessary in case of collecting personal data, in accordance with art. 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, GDPR).

INFORMATION CONCERNING THE PROCESSING OF PERSONAL DATA

FOR PATIENTS/CUSTOMERS

Who is the Controller of personal data?	The Controller of your personal data is the Invicta group of companies (hereinafter Invicta), acting as a co-controller of personal data (Invicta spółka z o.o., Invicta Management Sp. z o.o., Medyczne Laboratoria Diagnostyczne Invicta Sp. z o.o., Invicta Software Sp. z o.o., Zarządzanie Nieruchomościami Invicta Sp. z o.o., Invicta Nieruchomości Sp. z o.o. based in Sopot (81-740) at ul. Polna 64, phone 58 58 58 800, e-mail invicta@invicta.pl.
Who can I contact regarding my personal data?	In all matters related to personal data you can contact our Data Protection Officer: Beata Gozdecka e-mail address daneosobowe@invicta.pl ul. Polna 64 81-740 Sopot
Is providing personal	Provision of your personal data in the case of provision of medical services, excluding your telephone number and email address which is entirely voluntary, is a statutory requirement. Failure to provide the requested data may prevent the proper course of

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data voluntary?	the treatment process. Failure to provide your e-mail address and telephone number may hinder the provision of up-to-date information on the organisation of your treatment, e.g. information on cancellation of your medical appointment. In the case of consent to receive information and consent to adapt the content of the information provided: providing data is completely voluntary, but it may hinder contact and ongoing service. In other cases (e.g. using a Medipoint.pl account, participation in the donation qualification process), providing data is voluntary, but failure to provide data will prevent the use of certain services or participation in selected processes.	
For what purpose and on what basis is the data processed?	**Purpose of data processing**	**Basis of processing** **Data retention period**
Use of medical services		
	Your personal data is processed for the purpose of providing healthcare services, including preventive health or occupational medicine, medical diagnosis, provision of healthcare, treatment or management of healthcare systems and services. For this purpose, your personal data will be processed:	• Article 9 (2) (h) GDPR *processing is necessary for the purposes of preventive health or occupational medicine, to assess an employee's fitness for work, medical diagnosis, the provision of healthcare or social security, treatment or the management of healthcare or social security systems and services*

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	• in order to establish your identity prior to the provision of services, verifying your information when making a remote appointment (by phone, through a form or registration system) and directly at our Clinics, Sample Collection Points, Vaccination Points, Residence and Recovery Area and other departments; • for contact (by telephone, e-mail) to confirm or remind you of your appointment or examination booking, inform you about the need to prepare for the planned treatment, inform you that test results are ready to be collected, to process your request or complaint; • to fulfil the obligation to keep and retain medical records; • to qualify you for a publicly subsidised infertility treatment program, and then carry out the treatment and settle it with the financing entity; • to report on your vaccination status and provide data and information on infections and infectious diseases to the relevant authorities; • to improve the quality of the services, and to continually monitor patient needs and	• Act of 6 November 2008 on Patient Rights and the Patients' Ombudsman • Act of 25 June 2015 on Infertility Treatment • Regulation of the Minister of Health of 23 March 2006 on quality standards for medical diagnostic and microbiological laboratories • Act of 5 December 2008 on Preventing and Combating Infections and Infectious Diseases in Humans • EN ISO 9001 quality management system *Data retention period Your personal data is stored for the period required for the storage and archiving of medical records as defined by law, in particular the Act of 6 November 2008 on Patient Rights and the Patients' Ombudsman (Article 29) and the Infertility Treatment Act of 25 June 2015.*

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	expectations, we may make requests for service evaluations or short surveys; We will send surveys in a way that does not violate your rights. If you do not wish to receive such messages, please let us know.	
Using cosmetic services		
	Your personal data is processed: • to establish your identity before providing the service, to verify your data when booking an appointment remotely (by phone, via a form, or registration system) and directly at our Clinics; • to contact you (by phone or email) in order to confirm or remind you of your appointment, inform you about the need to prepare for a planned procedure, or handle your complaint; • for the purpose of conducting online consultations via the website, in the form of a video conference (ZOOM/TEAMS) or by phone;	• GDPR Art. 6(1)(b) *Processing is necessary for the performance of a contract.* *Data storage period: 5 years counted from the end of the calendar year in which the purchase was made.* • GDPR Art. 9(2)(a) *The data subject has given explicit consent (…)* *Data storage period: until the consent is withdrawn, unless the data becomes part of medical documentation.*
Participation in the gamete donation process		

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	Your personal data is processed for the following purposes: • initial qualification for gamete donation in non-partner donation; • medical qualification for cell donation; • gamete donation process • fulfilling the obligations resulting from provisions of law - creating medical documentation, entering data into registers; • settlement and reimbursement of lump-sum costs of participation in the program, issuing and sending a tax return.	• GDPR Article 9 (2) (a) *The data subject has given their explicit consent (…)* *Data retention period: until consent is withdrawn* • GDPR Article 9 (2) (h) *processing is necessary for the purposes of preventive health or occupational medicine, to assess an employee's fitness for work, medical diagnosis, the provision of healthcare or social security, treatment or the management of healthcare or social security systems and services* • Act of 6 November 2008 on Patient Rights and the Patients' Ombudsman • Act of 25 June 2015 on Infertility Treatment • Act of 6 November 2008 on Patient Rights and the Patients' Ombudsman • Act of 25 June 2015 on Infertility Treatment *Data retention period Your personal data is stored for the period required for the storage and archiving of medical records as defined by law, in particular the Act of 6 November 2008 on Patient Rights*

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		and the Patients' Ombudsman (Article 29) and the Infertility Treatment Act of 25 June 2015. *Data retention period: Your personal data related to the payment of compensation and the issuance of a tax return will be stored for the period specified in the tax and accounting regulations.*
Participation in scientific research		
	Your data may be processed within the framework of scientific research conducted by Invicta, including in the framework of proceedings before entities, conducting supervision of ongoing scientific, clinical research, etc. Details of the processing of personal data in specific studies will be provided before consenting to participate in the study in question.	• GDPR Article 9 (2) (a) *The data subject has given their explicit consent (...)* *Data retention period: until consent is withdrawn or for the mandatory retention period for records of the study in question.*
Sale of services and examinations via the Internet		
	Your personal data is processed for the purpose of fulfilling the order you have placed regarding the sale of services and/or examinations (including reservation of biological material), that take place via our websites.	• GDPR Article 6 (1) (b) *The processing is necessary for the performance of the agreement* *Data retention period: 5 years counted from the end of the calendar year in which the purchase was made.* • GDPR Article 9 (2) (a) *The data subject has given their explicit consent (...)*

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	Sometimes, in order to perform the service, it is necessary to provide additional data (e.g. PESEL number), e.g. to set up a file.	*Data retention period: until consent is withdrawn, unless the data becomes part of the medical documentation.*
Conclusion and performance of the agreement		
	Your personal data is necessary for the conclusion and performance of an agreement (including making payments) to which you or the person on whose behalf you are acting is a party	• GDPR Article 6 (1) (b) *processing is necessary for the performance of the agreement* *Data retention period: until the expiry of the limitation period for potential claims.*
Bookkeeping		
	Invicta keeps accounting books and performs tax obligations, including keeping tax records.	• The Accounting Act of 29 September 1994. • Tax regulations *Data retention period: 5 years counted from the end of the calendar year in which the tax obligation arose*
Pursuit of claims		

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	Your data may be processed in order to assert or defend claims in respect of the services we provide.	• GDPR Article 9 (1) (f) *processing is necessary to establish, assert or defend claims* *Data retention period: until the expiry of the limitation period for potential claims.*
Enabling the use of an account on the Medipoint.pl Portal		
	Invicta provides Users with the opportunity to create an account on the Medipoint.pl Portal and use the functionalities provided thereby. Patients may have their medical data from the patient's file sent to their account.	• GDPR Article 9 (1) (a) *the data subject has given their explicit consent to the processing of this personal data* *Data retention period: until consent is withdrawn*
CCTV		
	Your image may be recorded for the security of persons and property.	• GDPR Article 6 (1) (f) *processing is necessary for the purposes of the legitimate interests pursued by the controller* *Data retention period: 3 months*
Recording of telephone conversations		

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	Your personal data is processed in order to improve the quality of service and verify the information provided.	• GDPR Article 9 (1) (a) *the data subject has given their explicit consent to the processing of this personal data* *Data retention period: until the expiry of the limitation period for potential claims.*
Recording of conversations in the form of videoconferencing (TEAMS/ZOOM)		
	Your personal data is processed for the purpose of archiving consents, declarations or statements made. The recordings are archived in the medical file.	• GDPR Article 9 (2) (h) *processing is necessary for the purposes of providing healthcare and managing healthcare systems and services.* *Data retention period: Your personal data is kept for the period required for the storage and archiving of medical records as specified by law, in particular the Act of 6 November 2008 on Patient Rights and Patients' Ombudsman (Article 29).*
Information about Invicta's activities, services, promotions		
	Your data may be processed in order to receive (by email, SMS, MMS, incoming calls to a telephone number) from Invicta information about Invicta activities and events, including services, products and news, as well as discounts, promotions and benefits.	• GDPR Article 9 (1) (a) *the data subject has given their explicit consent to the processing of this personal data* *Data retention period: until you withdraw your consent.*
Participation in competitions		

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	Your data will be processed for the purpose of conducting the competition, awarding the prize, and ensuring its delivery/fulfilment.	• GDPR Article 6(1) (a) or 9(1) (a) depending on the scope of the processed data. the data subject has given explicit consent to the processing of their personal data. *Data retention period: until the competition is completed.*
Image		
	If you consent to your image being shared, it may be used on our website, on our social media profile and in our communication materials, depending on the scope of your consent.	• GDPR Article 9 (1) (a) *the data subject has given their explicit consent to the processing of this personal data* *Data retention period: until consent is withdrawn*
AI systems		
	If you consent to the processing of photographs taken during the provision of healthcare services for the purpose of developing AI systems, such data may be used for the development, testing, and improvement of internal artificial intelligence systems employed to analyze the outcomes of aesthetic and reconstructive procedures, as well as for the creation of internal models and algorithms supporting the assessment of	• GDPR Article 9 (1) (a) *the data subject has given their explicit consent to the processing of this personal data* *Data retention period: until consent is withdrawn*

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	treatment effectiveness, safety, and procedure planning.	
Processing of data by automated means		
	Your personal data may be processed in order to tailor the information provided to you to your needs and expectations (profiling). If you consent to the processing of personal data by automated means, including profiling in order to tailor the information provided to you, this will involve combining data received from you with information relating to characteristics, behaviour, preferences in order to tailor commercial information to known or anticipated needs or expectations (profiling). In this way, you will receive such information that corresponds to your needs and that is of interest to you.	• GDPR Article 9 (1) (a) *the data subject has given their explicit consent to the processing of this personal data* *Data retention period: until you withdraw your consent.*
What rights do I have?	• you have the right to request access to your personal data, rectification, erasure or restriction of processing; • you have the right to object to the processing, as well as the right to data portability. Please make your requests directly to the Clinic or by email to daneosobowe@invicta.pl; • data: first and last name, date of birth, gender designation, address of residence, PESEL number, if assigned, in the case of a newborn child - the mother's PESEL number, and in the case of persons who have not been assigned a PESEL number - the type and number of the document confirming identity, if the patient is a minor, completely incapacitated or incapable of conscious consent - first and last name of the legal representative and the address of his or her place of residence, as well as data on past, present or future physical or mental health condition, including genetic data is part of the medical records	

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	and cannot be removed by the Controller. This does not apply to consent to the transmission of information and consent to profiling; • you have the right to lodge a complaint with the supervisory authority (President of the Office for Personal Data Protection, POPDP) if you consider that the processing of your personal data violates the provisions of the GDPR or other regulations on personal data protection; • you have the right to withdraw your consent to the processing of your email address and telephone number, as well as your consent to the transmission of information and consent to profiling, at any time without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal.
To whom is my personal data transferred?	Your personal data, especially health data, is confidential and subject to a high degree of protection. Your personal data may be communicated to entities involved in the treatment process if this is necessary for the purposes covered by the consents given or by law. Your personal data may be transferred to: • entities to which we have entrusted your personal data under an entrustment agreement, which participate in the handling of the treatment process; • other medical entities which cooperate with Invicta to ensure continuity of treatment and are subcontractors of medical services; • providers of technical and marketing services, in particular providers of ICT services, diagnostic equipment, courier and postal companies, providers of services in the marketing area (advertising agencies, SMS and e-mail companies), • providers of legal services in the event of redress; • persons authorised by you to access your medical records and health information; • entities financing medical services, in particular the National Health Fund and state and local government entities in the scope of infertility treatment programmes. The transfer of personal data to a third country will only be possible upon your explicit request.

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INFORMATION CONCERNING THE PROCESSING OF PERSONAL DATA FOR CONTRACTORS

Who is the Controller of personal data?	The controller of your personal data is the Invicta group of companies (hereinafter Invicta), acting as a co-controller of personal data (Invicta spółka z o.o., Invicta Management Sp. z o.o., Medyczne Laboratoria Diagnostyczne Invicta Sp. z o.o., Invicta Software Sp. z o.o., Zarządzanie Nieruchomościami Invicta Sp. z o.o., Invicta Nieruchomości Sp. z o.o. based in Sopot (81-740) at ul. Polna 64, phone: 58 58 58 800, e-mail invicta@invicta.pl.	
Who can I contact regarding my personal data?	In all matters related to personal data you can contact our Data Protection Officer: Beata Gozdecka e-mail address daneosobowe@invicta.pl ul. Polna 64 81-740 Sopot	
Is providing personal data voluntary?	Providing personal data (name, telephone number, e-mail address, title, name of the represented entity and registered office of this entity) is completely voluntary but necessary to get acquainted with the offer, participate in the tender procedure, conclude the Agreement, and the refusal to provide the data results in the impossibility of establishing cooperation, signing and implementing the Agreement, participating in the tender procedure, including the one financed from public funds (e.g. EU funds).	
For what purpose and on what basis are the data processed?	**Purpose of data processing**	**Basis of processing** **Data retention period**
Establishment of cooperation		

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	Your personal data will be processed in order to get acquainted with the offer presented by you or the company on behalf of which you act. Your personal data will also be used in proceedings for the award of contracts, including contracts carried out as part of projects financed by EU funds or other public funds.	• GDPR Article 6 (1) (b) *processing is necessary to take steps at the request of the data subject prior to entering into a contract* • GDPR Article 6 (1) (c) *the processing is necessary to fulfil the legal obligation imposed on the Controller* *Data retention period: a maximum of 10 years for proceedings conducted as part of projects financed by EU funds or other public funds.*
Conclusion and performance of the agreement		
	Your personal data is necessary for the conclusion and performance of a contract (including making payments) to which you or the person on whose behalf you are acting is a party. Personal data may also be used in the performance and settlement of the contract concluded in the procurement procedure, including contracts carried out as part of projects financed by EU funds or other public funds.	• GDPR Article 6 (1) (b) *processing is necessary for the performance of the agreement* *Data retention period: until the expiry of the limitation period for potential claims.* • GDPR Article 6 (1) (c) *the processing is necessary to fulfil the legal obligation imposed on the Controller*

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Bookkeeping		
	Invicta keeps accounting books and performs tax obligations, including keeping tax records.	• The Accounting Act of 29 September 1994. • Tax regulations *Data retention period: 5 years counted from the end of the calendar year in which the tax obligation arose*
Pursuit of claims		
	Your data may be processed in order to assert or defend claims in respect of the services we provide.	• GDPR Article 6 (1) (f) *processing is necessary to establish, assert or defend claims* *Data retention period: until the expiry of the limitation period for potential claims.*
Recording of conversations in the form of videoconferencing (TEAMS/ZOOM)		
	Your data may be processed to archive conversations, training sessions, meetings.	• GDPR Article 6 (1) (a) *the data subject has given their explicit consent to the processing of this personal data* *Data retention period: until you withdraw your consent.*
Participation in competitions		
	Your data will be processed for the purpose of conducting the competition, awarding the prize, and ensuring its delivery/fulfilment.	• GDPR Article 6(1) (a) the data subject has given explicit consent to the processing of their personal data.

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		Data retention period: until the competition is completed.
What rights do I have?	• you have the right to request access to your personal data, rectification, erasure or restriction of processing; • you have the right to object to the processing, as well as the right to data portability. Please submit your requests by email to daneosobowe@invicta.pl; • data which is processed on the basis of legal regulations and whose storage is a legal obligation (e.g. on the basis of tax regulations) cannot be deleted by the Controller. Other data may be deleted at your request; • you have the right to lodge a complaint with the supervisory authority (President of the Office for Personal Data Protection, POPDP) if you consider that the processing of your personal data violates the provisions of the GDPR or other regulations on personal data protection.	
To whom is my personal data transferred?	Your personal data may be transferred to: • providers of technical or banking services, in particular ICT service providers, courier and postal companies and banks; • providers of legal services in the event of redress; • management and intermediary bodies (in the case of participation in competitive procedures for projects financed by EU funds or other public funds). The transfer of personal data to a third country will only be possible upon your explicit request.	
Is my data processed in any other way?	Your personal data will not be processed by automated means, including profiling.	

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