

# GDPR Compliance Statement

## 1. Data Controller

Healwise International Ltd. (“we,” “us,” or “our”) is the data controller for the personal data we collect and process in connection with facilitating access to neurosurgery treatments globally for international patients. We determine the purposes for which and the means by which such personal data is processed.

- **Name of Data Controller:** Healwise International Kft.
- **Registered Address:** 1138 Budapest, Népfürdő utca 19/A 6/24., Hungary
- **Contact Email:** info@healwise.net
- **Contact Phone:** +44 20 3026 4748

If you have any questions regarding this GDPR Compliance Statement or wish to exercise your rights, please contact us at the details provided above.

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## 2. Personal Data We Process

We collect and process personal data for various legitimate business purposes related to coordinating neurosurgical treatments and associated travel or logistical services. The personal data we collect may include:

- **Identification Data:** Name, date of birth, passport or ID number (if required for travel coordination), and other unique identifiers.
- **Contact Data:** Address, email address, phone number.
- **Health-Related Data:** Medical history or other health information voluntarily provided by you or collected on your behalf, as necessary to facilitate healthcare services.
- **Travel Data:** Flight itineraries, accommodation preferences, visa details.
- **Payment Data:** Credit/debit card information or bank account details (if required for billing and payments).
- **Technical Data:** IP address, browser type, operating system, access times, and referring website addresses, collected via cookies or similar technologies.

Please refer to our Privacy Policy for more detailed information about what personal data we collect.

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## 3. Lawful Bases for Processing

We process personal data under the following legal bases, as permitted by the GDPR (Articles 6 and 9):

1. **Consent (Article 6(1)(a)):**

- Where you have given us explicit consent to process your health-related data to coordinate your medical treatment.
- For sending marketing communications, where required by law.
- 2. **Performance of a Contract (Article 6(1)(b)):**
  - Where processing is necessary to fulfill our contractual obligations to you, such as arranging medical consultations, coordinating travel, or processing payments.
- 3. **Legal Obligation (Article 6(1)(c)):**
  - Where we must process data to comply with legal or regulatory requirements (e.g., recordkeeping, tax, or legal processes).
- 4. **Legitimate Interests (Article 6(1)(f)):**
  - For certain operational purposes, such as ensuring the security of our Site, preventing fraud, and improving our Services, provided that these interests do not override your fundamental rights and freedoms.

For special categories of personal data (e.g., health data), we rely on your explicit consent (Article 9(2)(a)) or other lawful exemptions under GDPR, as applicable.

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## 4. Data Subject Rights

Under the GDPR, you have the following rights regarding your personal data:

1. **Right of Access (Article 15):**

You have the right to obtain confirmation as to whether your personal data is being processed, and to request a copy of the data we hold about you.
2. **Right to Rectification (Article 16):**

You have the right to request the correction of inaccurate or incomplete personal data.
3. **Right to Erasure (Article 17):**

Also known as the “right to be forgotten,” you can request the deletion of your personal data, under certain conditions.
4. **Right to Restrict Processing (Article 18):**

You can request the restriction of our processing of your personal data, under certain circumstances.
5. **Right to Data Portability (Article 20):**

You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to request that we transmit such data to another controller, where technically feasible.
6. **Right to Object (Article 21):**

You can object, on grounds relating to your particular situation, to the processing of your personal data where we rely on legitimate interests. You can also object to direct marketing at any time.
7. **Right not to be subject to Automated Decision-Making (Article 22):**

You have the right not to be subject to a decision based solely on automated processing, including profiling, if it produces legal or similarly significant effects on you.

To exercise any of these rights, please contact us at [info@healwise.net](mailto:info@healwise.net). We will respond to your request in accordance with GDPR timelines (generally within one month of receiving the request, unless otherwise permitted by law).

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## 5. Data Retention

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, including for legal, accounting, or reporting requirements. Once the applicable retention period expires, we will securely dispose of or anonymize your data, in accordance with GDPR requirements.

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## 6. Data Transfers Outside the EEA

As part of our global services, we may transfer personal data to healthcare providers and other service partners located outside the European Economic Area (EEA). In such cases, we take appropriate measures to ensure your personal data remains protected, including, where required, by implementing:

- **European Commission Standard Contractual Clauses (SCCs)** or other lawful transfer mechanisms.
- **Additional security or contractual measures**, such as encryption or strict data processing agreements with our partners.

You can request more information about the specific transfer mechanism and safeguards we apply by contacting us at [Email Address].

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## 7. Security Measures

We implement technical and organizational measures designed to protect your personal data against unauthorized access, loss, misuse, alteration, or destruction. These measures include:

- Secure servers and encrypted connections (HTTPS).
- Access controls, limiting personal data access to authorized personnel.
- Regular security assessments and privacy impact assessments (where necessary).

While we strive to protect your personal data, no system is entirely secure. We encourage you to take reasonable steps to safeguard your information, such as using strong passwords and keeping them confidential.

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## 8. Data Breach Notification

In the event of a personal data breach that is likely to result in a high risk to your rights and freedoms, we will notify you and the relevant supervisory authority without undue delay, in accordance with Articles 33 and 34 of the GDPR.

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## **9. Children's Data**

We do not knowingly collect or process personal data from children under 16 years of age (or the minimum legal age in your jurisdiction). If we become aware that we have inadvertently collected data from a child, we will take steps to delete such data without undue delay.

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## **10. Updates to This Statement**

We may update this GDPR Compliance Statement from time to time to reflect changes in our practices or legal requirements. When we do, we will revise the “Last Updated” date at the top of this Statement. We encourage you to review this Statement periodically to stay informed about our compliance efforts.

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## **11. Contact Us**

If you have questions about this GDPR Compliance Statement, or if you wish to make a complaint about how we handle your personal data, please contact us at:

Healwise International Kft.  
1138 Budapest, Népfürdő utca 19/A 6/24., Hungary  
+44 20 3026 4748  
info@healwise.net

If you are not satisfied with our response, you have the right to lodge a complaint with a supervisory authority in your country of residence, place of work, or location of the alleged infringement.