

### **Privacy Policy**

Last Updated: 12th February, 2025

Thank you for visiting Healwise International Ltd. ("**Company**," "**we**," "**us**," or "**our**"). Your privacy is very important to us. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website healwise.net (the "**Site**") and/or use our services (collectively, the "**Services**"), which facilitate access to neurosurgery treatments globally for international patients. By using our Site and Services, you consent to the data practices described in this Privacy Policy.

### 1. Scope

This Privacy Policy applies to all personal information collected through the Site and Services, as well as any related online and offline offerings. It does not apply to any thirdparty sites or services that you may access through the Site. We encourage you to review the privacy policies of any third-party websites or services you visit.

# 2. Information We Collect

### 2.1 Personal Data

When you use our Site or Services, you may be asked to provide personal data that can be used to identify you or contact you. This may include, but is not limited to:

- Contact Information: name, email address, phone number, mailing address
- Health-Related Information: information about your neurosurgical needs, medical history, or other sensitive data you voluntarily provide in the course of using our Services
- **Payment Information:** billing details, credit/debit card details, or bank account information, if applicable
- **Travel Information:** passport or visa details, flight itineraries, or accommodation preferences, if you are utilizing our medical travel coordination services

### 2.2 Non-Personal Data

We may also collect non-personal information that does not, on its own, reveal your specific identity or directly relate to an identifiable individual. This may include:

- Usage Data: IP address, browser type, device type, operating system, referral URLs, pages visited, and the dates/times of visits
- **Aggregated Data:** statistical or aggregated information that does not directly identify a specific person (e.g., overall traffic patterns)

### 2.3 Cookies and Tracking Technologies



We use cookies, web beacons, and similar tracking technologies to help personalize your experience, analyze usage, and deliver relevant advertising. You can control the use of cookies through your browser settings or other tools.

# **3. How We Use Your Information**

We use your personal data for the following purposes, where applicable and lawful:

- 1. **Provision of Services:** 
  - To schedule, coordinate, and manage neurosurgery treatment options worldwide.
  - To process payments or other transactions.

#### 2. Communication:

- To respond to your inquiries, questions, or requests.
- To send administrative or account-related information, such as updates to our terms and policies.

#### 3. Personalization:

- To tailor the Services to your preferences and improve your user experience.
- 4. Marketing and Promotions (Where Lawful):
  - To send you marketing communications and newsletters about our Services, special offers, and other information we believe may interest you. You can unsubscribe at any time.

#### 5. Analytics and Improvements:

• To understand how users interact with our Site and Services in order to improve functionality, user experience, and marketing efforts.

#### 6. Legal Obligations and Compliance:

- To comply with legal obligations, such as recordkeeping, tax, and other government regulations.
- To protect our rights, privacy, safety, property, and/or that of our users or others.

# **4. Legal Basis for Processing (For Users in the European Economic Area)**

If you are located in the European Economic Area ("EEA"), we only process your personal data based on valid legal grounds, including when:

- You have given consent.
- **Processing is necessary for the performance of a contract** with you (e.g., to provide the Services you request).
- Processing is necessary to comply with a legal obligation.
- **Processing is necessary for our legitimate interests**, provided that your fundamental rights and freedoms do not override those interests.



### 5. Disclosure of Your Information

We may disclose your information under the following circumstances:

#### 1. Service Providers:

We may share information with trusted third-party service providers who assist us in providing our Services, such as payment processors, travel agencies, medical institutions, or IT service providers. These entities are contractually bound to use your data only as necessary to perform services on our behalf and to maintain its confidentiality.

#### 2. Medical Institutions and Practitioners:

If you choose to proceed with certain neurosurgical treatments, we may share your relevant personal and medical information with healthcare providers, hospitals, clinics, or other facilities as needed to facilitate your care.

#### 3. Business Transfers:

In the event of a merger, acquisition, reorganization, or sale of all or substantially all of our assets, your personal data may be transferred as part of that transaction. You will be notified via email and/or a prominent notice on our Site if such a transfer occurs.

#### 4. Legal Compliance and Protection:

We may disclose your information to comply with applicable law, respond to lawful requests or legal process, enforce our agreements or policies, or protect our rights, property, or safety or that of others.

#### 5. With Your Consent:

We may share your information for any other purpose disclosed to you at the time we collect the data or pursuant to your consent.

# 6. International Data Transfers

Because we facilitate neurosurgery treatments globally, your personal data may be transferred to and processed in countries outside of your country of residence. These countries may have data protection laws that are different from those of your country. In such cases, we will take appropriate safeguards to ensure your personal data remains protected, including by implementing the European Commission's Standard Contractual Clauses (SCCs) or other lawful transfer mechanisms, where required by applicable law.

# 7. Data Retention

We retain personal data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. Once the retention period expires, we will securely delete or anonymize your personal data.



# 8. Security Measures

We implement appropriate technical and organizational security measures to protect your personal data against unauthorized access, loss, misuse, disclosure, alteration, or destruction. Despite our efforts, no security measure or modality of data transmission over the internet can be guaranteed to be 100% secure. You are also responsible for taking reasonable steps to protect your personal data, such as safeguarding your account credentials.

# 9. Your Rights and Choices

### 9.1 General Rights

Depending on your jurisdiction, you may have certain rights regarding your personal data, such as:

- Access: You may request to access a copy of the personal data we hold about you.
- **Rectification:** You may request to correct any incomplete or inaccurate personal data.
- **Deletion:** You may request that we delete your personal data, under certain conditions.
- **Restriction:** You may request that we restrict the processing of your personal data, under certain conditions.
- **Data Portability:** You may request a copy of your personal data in a structured, commonly used, and machine-readable format, and to have that data transferred to another organization, under certain conditions.
- **Objection:** You may object to certain types of processing, including direct marketing.

To exercise these rights, please contact us at the information provided in the "Contact Us" section below. We will respond to your request in accordance with applicable law.

### 9.2 Marketing Communications

You can opt-out of marketing-related emails by following the unsubscribe instructions in any email you receive from us or by contacting us directly. Even if you opt out, we may still send you non-promotional communications related to your account or use of our Services.

### 9.3 Cookies and Other Tracking Technologies

Most web browsers allow you to control cookies through browser settings. If you choose to disable cookies, certain parts of our Site may not function properly.

# 10. Children's Privacy

Our Services are not directed to individuals under the age of 16 (or other age as required by local law). We do not knowingly collect personal information from children under 16. If you



become aware that a child has provided us with personal data, please contact us immediately. If we discover that a child under 16 has provided us with personal information, we will delete such information from our records promptly.

### **11. Third-Party Links**

Our Site may contain links to third-party websites or services that are not owned or controlled by us. We are not responsible for the privacy practices of these third parties. We encourage you to review the privacy policies of any third-party website or service before providing your personal data.

### 12. Updates to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes to our practices, technologies, legal requirements, and other factors. When we do, we will revise the "Last Updated" date at the top of this Privacy Policy. We encourage you to periodically review this page for the latest information on our privacy practices.

# 13. Contact Us

If you have any questions about this Privacy Policy, or if you wish to exercise any of your rights, you may contact us using the following details:

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Healwise International Kft.
1138 Budapest, Népfürdő utca 19/A 6/24., Hungary
+44 20 3026 4748
info@healwise.net
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We will endeavor to respond to any requests or questions within a reasonable timeframe and in accordance with applicable laws.