CUF PRIVACY POLICY

CUF – Serviços de Saúde, Administrativos e Operacionais, ACE, with registered office at Avenida do Forte, 3, Edifício Suécia III - Piso 2, in Carnaxide, company number 507 601 866, (hereinafter referred to as "ACE"), a complementary grouping of companies that manages CUF healthcare units, (hereinafter jointly referred to as "CUF") is committed to protecting the safety and privacy of its Customers. In this regard, it prepared this CUF Privacy Policy (hereinafter "**Privacy Policy**"), with the aim of demonstrating its commitment and respect for the rules on privacy and protection of personal data.

It is our intention that our Customers know the general privacy rules and the terms for processing the data we collect, in full compliance with the applicable legislation in this regard, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016 ("General Data Protection Regulation" or "GDPR"), with regard to the processing of personal data and the free movement of such data, as well as Law 58/2019, of 8 August 2019, which ensures the implementation of the GDPR in the Portuguese legal system.

CUF healthcare units (hereinafter referred to as "**CUF Healthcare units**"), better identified herein and belonging to CUF, need to collect and process the personal data of their customers within the provision of services. In fact, in the context of healthcare or treatment, including preventive medicine, medical diagnosis and management of health services, the processing of customers' personal data is essential.

On the other hand, the increasingly frequent interaction of our websites, applications and digital services with the users (hereinafter jointly referred to as "**Platforms**"), also requires, in some cases, collecting personal information from the user so that the services provided by CUF Healthcare units may be enjoyed, or collecting data from the user's device (by means of files referred to as cookies), to improve the performance of said Platforms.

In this sense, the Privacy Policy is intended to help our customers and users of the Platforms (hereinafter jointly referred to as "**Customer(s)**") understand what personal data we collect, how and for what purposes do we use it, to whom we disclose it and how we protect their privacy when using our services or visiting our Platforms.

CUF seeks to uphold the best practices in terms of security and protection of personal data, promoting actions and improving systems in order to safeguard the protection of the data provided to it by its Customers.

The use of and browsing within the Platforms, the filling in of the forms and the provision of data directly or indirectly, imply knowledge of the conditions of this Privacy Policy, and of any other specific terms, policies and conditions regarding the services provided.

For certain purposes, CUF may only process the personal data of its Customers if it obtains their prior and express consent. In particular, processing for the purpose of sending informative and marketing communications which are considered relevant to promote their health and provide excellent healthcare in CUF Healthcare Units, through the different communication channels, whether physical or digital, namely email, text message or letter. The remaining cases are listed in the section "Purposes and Reasons for the collection of personal data".

Definitions

Anonymisation – technique resulting from the processing of personal data in order to remove sufficient elements from them so that it is no longer possible to identify the data subject, irreversibly. More precisely, the data must be processed in such a way that they may no longer be used to identify a natural person using «all the means that can reasonable be used», either by the controller or by third parties. The main techniques to anonymise personal data are randomisation and generalisation;

Supervisory authority – an independent public authority which is established by a Member State, responsible for monitoring the application of GDPR, in order to protect the fundamental rights and freedoms of natural persons in relation to processing and to facilitate the free flow of personal data within the Union. In Portugal, the supervisory authority is the National Commission for the Protection of Personal Data [*Comissão Nacional de Proteção de Dados*] ("CNPD");

Data protection impact assessment – "DPIA") – a process created to assess the necessity and proportionality of the processing of personal data, which allows managing risks arising from said processing to the rights and freedoms of natural persons. The DPIA is mandatory in certain cases (for instance: systematic and extensive evaluation of natural persons, including profiling or processing on a large scale of special categories of data) and must be performed prior to starting the processing;

Special categories of data – Personal data that may be more sensitive in certain situations. These may concern the racial or ethnic origin of his/her holder, political opinions, religious or philosophical beliefs, genetic information, biometric identifiers, sex life, sexual orientation or health.

Consent of the data subject – a freely given, specific, informed and unambiguous indication by which the data subject agrees, by means of a declaration or clear affirmative act, that the personal data relating to him or her is subject to processing;

Personal data – Any information, of any nature and regardless of its format, including sound and image, relating to an identified or identifiable natural person (data subject). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or more factors specific to the physical, physiological, mental, economic, cultural or social identity of that natural person.

Personal data concerning health – Personal data pertaining to the physical or mental health of a natural person, including the provision of healthcare services which reveal information relating to his/her past, current or future health status. These include, for instance, *(i)* any number, symbol or particular sign assigned to a natural person to uniquely identify the natural person for health purposes; information derived from the testing or examination of a body part or bodily substance, including from genetic data and biological samples; *(ii)* any information on, for example, a disease, disability, disease risk, medical history, clinical treatment or the physiological or biomedical state of the data subject independent of its source, for example from a physician or other health professional, a hospital, a medical device or an *in vitro* diagnostic test.

Profiling – any form of automated processing of personal data consisting of the use of those personal data, in particular, to include a natural person in a certain category, concerning his/her performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

Data protection officer ("DPO") – person or entity appointed to ensure, in an organisation, that the processing of personal data complies with the GDPR, ensuring an efficient communication with the data subjects and the cooperation with the supervisory authorities concerned, while also reaching out to the business units within the organisation. The DPO does not receive instructions on the performance of its duties, reporting directly to the governing bodies of the entity that appointed it/him/her (controller or processor);

Privacy by design – means taking into consideration privacy risk throughout the design process of a new product or service, instead of considering privacy issues only at a later stage. This means carefully assessing and implementing appropriate technical and organisational measures and procedures from the outset to ensure that the processing complies with the GDPR and protects the rights of the data subjects concerned;

Privacy by default – means ensuring that mechanisms are put in place within an organization to ensure that, by default, only the necessary amount of personal data is collected, used and stored for each task, both in terms of the amount of data collected and the time during which they are stored;

Pseudonymisation – means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;

Controller – means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

Information society services – Any service normally provided for remuneration, at a distance, by electronic means and at the individual request of a recipient of services. For the purposes of this definition:

1. "at a distance": means that the service is provided without the parties being simultaneously present;
2. "by electronic means": means that the service is sent initially and received at its destination by means of electronic equipment for the processing (including digital compression) and storage of data, and entirely transmitted, conveyed and received by wire, by radio, by optical means or by other electromagnetic means; and
3. "at the individual request of a recipient of services": means that the service is provided through the transmission of data on individual request.

Processor – means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

Third party – means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

Data subject – means an identified or identifiable natural person to whom the personal data relate;

Processing – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Personal data breach – means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

Controller of your personal data

In accordance with the GDPR, the Controllers shall be considered as the entities that provide services to you, determining the purposes of and the means for processing your data in the context of that provision.

Customer service in our CUF Healthcare units

The Controller of the data required to provide the healthcare services (for instance, for the purposes of preventive medicine, medical diagnosis, administrative management of clinical records, scheduling of medical appointments and exams, admission and delivery of exams, electronic prescription of medicinal products and further diagnostic examinations) shall be the CUF Healthcare unit providing those services to you.

However, this does not mean that, if you are assisted in one of the remaining CUF Healthcare units you have to provide all your personal data again so that we can provide you with healthcare services in that Unit. In view of the provision of integrated healthcare services in all the CUF Healthcare units, the professionals of that Unit may consult and use the information which we collect in other CUF Healthcare Units, through their computer systems.

Regarding the processing of that information, the CUF Healthcare Unit where the information is accessed shall be the Controller of the Customers' data, as well as with regard to the information that is collected directly from Customers in that Unit.

Within some medical specialties, your CUF Healthcare unit may process your data together with other entities, as co-controllers, as is the case with clinical pathology analyses, in which the Centro de Medicina Laboratorial Germano

de Sousa, S.A. acts as co-controller. To access the list of the co-controllers of your data and the context in which they act, click here.

Operation support activities

There is also a co-controller relationship of the personal data of CUF customers, between the CUF Healthcare units and the ACE better identified herein. This relationship concerns the processing of data of CUF Customers for the purposes of the administrative management of the services we provide to you. The ACE will be co-controller with regard to the processing of data required for the invoicing of healthcare services, to establish contacts with Customers in the context of the provision of services (for example, in response to complaints, clarification requests, suggestions and thanks, satisfaction and quality surveys) and also regarding the recording of calls to *(i)* evidence business transactions and *(ii)* monitor customer service.

Clinical studies and trials

The entity that will act as Controller of your personal data, as a rule, shall be the entity promoting the study or trial. As a rule, the promoter shall be an entity outside CUF. Therefore, the CUF Healthcare unit and its medical researchers, pursuant to protocols concluded with the promoters, shall act merely as Processors for the purposes of processing your personal data in this context.

Marketing communications, service improvement and meeting business goals

For the processing of data of CUF Customers for purposes related to the marketing of products and services - such as analysing consumer trends, defining new services/products, segmenting and analysing customer profiles and sending direct marketing communications through different communication channels, both physical and digital –, in order to improve our services and meet our administrative and commercial goals, our internal audit and compliance of the systems and processes of the CUF Healthcare units, the Controller shall only be the ACE.

Collection of personal data

CUF Healthcare units collect and process the personal data required to provide integrated healthcare, including for managing the systems and services of the CUF Healthcare unit, auditing and their ongoing improvement. Your data may be collected directly, particularly, when you schedule a medical appointment/exam, when you go to a medical appointment/undergo an exam, when you use our Platforms or contact us. We may also receive your personal data indirectly through our service providers providing services to you on our behalf or from our partners.

CUF Healthcare units are particularly concerned with the protection of the rights of minors. Therefore, the collection of personal data from children under 16 is dependent on the consent of their parents/guardians, where the offering of information society services is concerned, for instance, through the MyCUF Platform.

Means and moments for the collection of your data

Collection means and moments	Data collected
Basic and mandatory customer data - mandatorily supplied personal data (the Customer or user being duly informed of the obligation to provide such data to continue the process)	
Provided directly by the customer when the latter registers online at our institutional website via MyCUF, contacts CUF through the Contact Centre or goes to the *Front Office* of a CUF Healthcare unit.	Name, date of birth, gender, e-mail, phone/cell phone number, citizen's card and taxpayer number.
Supplied directly by the customer when the latter selects the Chatbot in order to make a medical appointment.	Taxpayer number and cell phone number (The BOT only requests these data, however, if an intervention by an operator is needed, other personal data may be requested, the same for our institutional website via MyCUF, contacts CUF through the Contact Centre or goes to the Front Office of a CUF Healthcare unit such as name, date of birth, gender, e-mail and citizen's card.
Supplied directly by the customer when the latter creates/manages a MyCUF account on the website.	E-mail address, gender, username and hash (encrypted information that enables the system to recognise the user's password)
Supplied for the purposes of Telemedicine in connection with direct video transmission.	Image, voice, traffic data and location.
Supplied directly by the customer when the latter registers on the MyCUF mobile application.	Name, date of birth, gender, e-mail, phone/cell phone number, citizen's card and taxpayer number, expiration date, social security number,Patient card number (NHS), father's name, mother's name, in case of underage (below 16), Photo in order to compare with citizen's card,Contact data: e-mail, phone/cell phone number and address; Login data: password de login and validation, PIN code, SMS code to validate cell phone number.
Supplied directly by the customer when the latter creates/manages a Cartão CUF subscription account on the website.	Name; user; taxpayer number; address; E-mail; phone/cell phone number; date of birth; gender; nationality; prefered channel of contact.
Further identification data	
Other identification data provided directly by the customer when the latter goes, for the first time, to a CUF Healthcare unit, when we create his/her customer file, for example, in the Contact Centre, except for the CUF identifier automatically generated by the system and other data whenever you insert your Citizen Card at the kiosk.	CUF customer number, Patient card number, Country, District and Municipality of Birth, address (location, postal code, country, district, municipality, parish), occupation, professional status, medical centre, family doctor, marital status, spouse's name, father's name, mother's name, data related to your health insurance or subsystem (when you want the services provided by the CUF Healthcare unit to be covered by them).

Health information	
Information related to your consultations, medical appointments or exams when you make an appointment/when you request information through the various channels (email, telephone, CUF Platforms, Contact Centre and chatbot).	CUF healthcare unit, medical appointment's date and time, the doctor's specialty, the exam performed/to be performed, data included in the medical prescription, among others required to the provision of services; the recording of the call (only if the medical appointment/request for clarification/complaint is scheduled/filed through the Contact Centre).
In the course of the provision of integrated healthcare, including for the management of the systems and services of the CUF Healthcare unit.	Reason for the medical appointment/procedure, personal history (childhood illnesses, immunisations, habits, gynaecological history, allergies, medication, active illnesses, inactive illnesses), family history (most frequent situations - diabetes, HT, PE, cancer, living/deceased, cause of death), clinical examination, diagnoses, further exams, referral, alerts (diabetes, hypertension, etc.), blood group; prescribed medicines, identification of the prescriber, code of the prescription location and prescription data and special co-payment rules; act and initials of the episode carried out, episode's start and end date, status of the episode, health professional who carried out the episode, episode number, type of episode, indication on whether there are results of the episode and identifier of these results, genetic data, racial or ethnic origin and data on sex life and sexual orientation.
Data for which you provided consent to their processing for a specific purpose [link to the General Document for the provision of Information and Consent Request]	
When you participate in our satisfaction surveys/questionnaires	Your opinion about us and other personal data requested on the form.
By analysing data previously shared by you for the purpose of marketing services and products of CUF Healthcare units	Identification, contact and consumption data, such as: age group, area of residence, telephone number, cell phone number, electronic address, frequency of visits to Units, Unit and Unit Service (functional area) visited by the Customer, data on customer consumption (act, Service, amount, payment method, date), identification of the Financial Entities (for example: ADSE, Advancecare, Multicare, among others..)
When you use our Platforms, pursuant to the Privacy Policies and the respective Cookies	Information on how you use our Platforms, such as: IP of the device you use to access them, the date and time of the start and end of the visit to the Platforms or the user's browser history.
When you subscribe to our newsletters (for example, Maternity + Health)	Email data, whether or not you are a CUF customer and pregnancy week (only applies to the Maternity newsletter.)
At the start and throughout clinical studies/trials	Data related to your health, genetic data, racial or ethnic origin and data related to sex life and sexual orientation (to be specified by the study/trial supervisor or researcher upon the informed consent request to participate in the study/trial)

Purposes and Reasons for the processing of personal data

CUF Healthcare units and the ACE will only process your personal data when they are duly qualified to do so. The GDPR requires, in order for the processing of personal data to be lawful, that there is an adequate legal basis for each specific processing purpose. Said reasons may be of various types.

Therefore, the processing of personal data may be based on the data subject's consent, the conclusion of a contract to which the data subject is a party, the compliance with legal obligations to which the Controller is subject, the protection of the data subject's vital interests or even the pursuit of the Controller's legitimate interests (except if the data subject's fundamental interests and freedoms prevail).

The main purpose for which we process data is to provide integrated healthcare to Customers, as well as to communicate and manage the relationship between CUF Healthcare units and the Customer.

As for the processing of personal data carried out by CUF, in particular, by the ACE, to inform you about news and offers which may be of your interest and to customise and enhance your customer experience (through surveys assessing customer satisfaction), the legal basis on which CUF justifies such processing shall be the **consent** of the data subjects, in other words, of its Customers.

It shall also be the case of the processing of data of CUF Healthcare unit Customers for the purposes of performing clinical studies or trials, where such studies or trials cannot be performed using anonymised or pseudonymised data.

Although the processing of data in those contexts is usually done by resorting to anonymised or pseudonymised information, it is possible that, in certain cases, it even involves certain identifying data, which may be related to the health of the subjects, the Customer number, identifiers of clinical procedures performed, among others. In those cases, the legal basis for the processing of those special categories of data will be the need to process in order to manage the systems and services of the CUF Healthcare Units.

- **Provide integrated healthcare services**

In order for us to provide our services, we use your information as specified above to make medical appointments, schedule medical examinations, medical diagnosis, provide healthcare, manage the systems and services of the different CUF Healthcare units, carry out audits and continuously improve our services.

Any data concerning your health will only be processed by or under the responsibility of a professional subject to the obligation of professional secrecy, to the extent strictly necessary to provide healthcare.

Basis - performance of the healthcare service agreement concluded with our Customers or execution of pre-contractual arrangements at the Customers' request (e.g. whenever medical appointments or clinical procedures are concerned.

Additionally, the processing of data concerning the health of our Customers or other special categories of data (such as genetic data, data concerning sex life or data concerning the ethnic origin of our Customers) or when such processing is made by employees of CUF Healthcare units, who are not clinical healthcare professionals (see section "WHICH CUF PROFESSIONALS HAVE ACCESS TO YOUR DATA?").

- **Comply with a legal obligation**

Replying to information requests (of personal data) by the Portuguese Central Administration for the Health System [*Administração Central do Sistema de Saúde*] ("ACSS"), the Portuguese Health Regulatory Authority [*Entidade Reguladora da Saúde*] ("ERS"), and other public healthcare entities, as well as by the Courts, Enforcement Agents,

and criminal police in the exercise of their powers and responsibilities (for more information on the categories of recipients of your personal data, please refer to the section "UNDER WHAT CIRCUMSTANCES ARE DATA PROVIDED TO OTHER ENTITIES?" below).

Basis - Compliance with legal obligations by the Controller.

- **Improve our services and achieve our administrative and business goals**

The business purposes for which we use your information include accounting, billing, and auditing, notably to protect the vital interests of our customers or to certify, assess, and measure the service levels of the relevant CUF Healthcare unit, fraud detection and analysis, safety, legal and procedural purposes, statistical surveys, as well as for system development and maintenance.

Basis - Legitimate interests of the Controller.

- **Communicate and manage our relationship with you**

We may contact you through our Electronic Platforms (e.g. MyCUF) or, if you prefer, by e-mail, letter or text message for administrative or operational reasons, as well as to provide you the following health or other information (non-exhaustive list): invoices, receipted invoices, credit notes, results of medical examinations, drug prescriptions, requests for medical examinations, proof of presence, medical reports, preparation for medical examinations, proof of appointments, informed consents for the performance of clinical procedures, consents for additional invoicing, applications for authorisation of clinical procedures (e.g. to/from Insurance Companies), and requests for portability of the clinical record.

We will also use your personal data in order to reply to your inquiries, suggestions, or contacts, and to improve our services and your experience as a customer of CUF Healthcare units.

Since these communications are not made for marketing purposes, you will continue to receive them even if you have chosen not to receive marketing communications.

Basis - performance of the healthcare service agreement concluded with our Customers or execution of pre-contractual arrangements at the Customers' request (e.g. whenever medical appointments or clinical procedures are concerned. Additionally, the processing of data concerning the health of our Customers or other special categories of data (such as genetic data, data concerning sex life or data concerning the ethnic origin of our Customers) or when such processing is made by employees of CUF Healthcare units, who are not clinical healthcare professionals (see section "WHICH CUF PROFESSIONALS HAVE ACCESS TO YOUR DATA?") for purposes of **managing the systems and services** of CUF Healthcare units, is carried out for the purpose of preventive medicine, medical diagnosis, and provision of healthcare or treatments.

- **Send communications regarding our products and services**

We may send you communications by electronic means, such as promotional messages of a generic nature and not adjusted to the customer profile, about products and services similar to those previously engaged by the Customer (healthcare services), and the Customer may object, at any time, to our sending such communications by clicking unsubscribe at the bottom of each message or by logging in to your MyCUF Account and managing your marketing preferences.

Basis - Legitimate interests of the Controller.

- **Customise and improve your experience as our customer**

If you have given us your consent to this processing so that we can adapt our services to your needs, interests, and preferences, and provide you an outstanding and customised service in CUF Healthcare units based on your profile, we will sort and send our communications solely by automated means, and there will be no human interaction whatsoever in these operations, which will enable CUF to make decisions that may produce legal effects concerning you or significantly affect you in a similar manner. Click here to access the document related to this purpose.

For example, based on your profile we may send you references of specialist physicians or campaigns of the CUF Healthcare units you visit more frequently, focusing on the Services/specialties that you use most.

In this regard, CUF undertakes to adopt suitable measures to safeguard your rights and freedoms and legitimate interests, notably by guaranteeing your right to obtain human intervention, to express your point of view and to challenge the decision at stake (for more information on this matter, please see section "WHAT ARE THE RIGHTS OF DATA SUBJECTS?" below).

We may also collect information on how you use our website and applications, in order to better understand your interests. We can use this information to adapt the content and offers that you see on our website. If you would like to know more about this subject, please click here

Basis - Consent of Data Subject

- **Inform you about news and offers that you might find interesting**

We may send you marketing communications, such as newsletters with news concerning CUF, as well as information and marketing communications considered relevant to promote your health and to provide you an outstanding service in CUF Healthcare units.

Please note that we will only share your personal data with other companies for marketing purposes if we have your consent to do so.

Basis - Consent of Data Subject

- **Carry out clinical studies and trials**

Clinical studies and trials involving the customer directly or indirectly shall have specific scientific purposes according to the ongoing clinical study / trial, such as, inter alia, diagnosis of medical conditions, testing innovative treatments, and new medicinal products, the purpose of which is always stated in the consent to the processing of your personal data in this regard (e.g. Whenever clinical studies or trials carried out in CUF Healthcare units, within which the latter will usually act as Processors (the Controllers being the clinical study/trial sponsors), cannot be carried out using data made anonymous or which have undergone pseudonymisation.

Basis - Consent of Data Subject

Which CUF professionals have access to your data?

When processing your personal data, CUF Healthcare units shall observe, at all times, the principles of privacy by design and privacy by default. This commitment means, among other things, that your personal data will be accessed only on a "need to know" basis in the performance of such persons' duties, to the extent strictly necessary for the envisaged purposes as specified above (see section "Purposes and Basis for collecting personal data").

Therefore, as regards the data concerning your health and other special categories of data, and in accordance with the applicable law, access to such data shall be reserved to the physicians and other clinical healthcare professionals in connection with the provision of your healthcare services. Otherwise, if your health data and other special categories of data are accessed by non-clinical staff, CUF Healthcare units and ACE must ensure that such employees undertake confidentiality obligations by way of an agreement vis-à-vis the former and, in certain cases, that such persons shall only process your data under the responsibility and supervision of a healthcare professional.
The cases where administrative or technical support staff has access to your health data and other special categories of data include the processing of data for purposes of billing for the healthcare services provided to you, scheduling medical appointments or clinical procedures, or managing your information requests or complaints (such as managers for surgical or oncological matters...)

How long do we keep your personal data for?

Our Customers' personal data collected by CUF Healthcare units and ACE are processed in strict compliance with the legislation in force and are stored in specific databases established to that end. Such data are stored in a format which allows the data subjects to be identified for no longer than is necessary for the purposes for which the data were processed.
The period during which the data are stored varies according to the purpose for which the information is used.
However, there are legal requirements that require us to retain the data for a certain period of time. As such, data concerning your health will be kept in accordance with the applicable legislation on storage of hospital documents.
In order to determine the appropriate data retention period, we also take as a reference the various resolutions of the European data protection supervisory authorities, notably the CNPD, for instance, with respect to the retention of telephone calls recorded by us to evidence a commercial transaction and to monitor calls, or to store access logs to our Platforms.

What are the rights of data subjects?

Pursuant to the applicable legislation, the data subject can, at all times, request access to his/her personal data, as well as the rectification and erasure of such data or restriction thereof, the portability of his/her data, or object to processing thereof, by personally contacting the CUF Healthcare unit, through the designated form on the Site - Subject: Data protection or letter addressed to the Data Protection Officer, Avenida do Forte, nº 3 - Edifício Suécia III, Piso 2 - 2790-073 CARNAXIDE.

Access

Right of access by the data subject (or any third parties with his/her consent or pursuant to the law) to his/her health data may be exercised directly or through a physician if the data subject so requires, by means of a written request made in person at any CUF Healthcare unit, upon production of an identification document (Citizen's Card and/or Power of Attorney).
You can obtain confirmation of and access to your personal data being processed, and therefore, if you so request and there are no legal restrictions, we will provide you with a copy of the personal data subject to processing by CUF.
In this respect, the right of access to your personal data is not unrestricted; as such, CUF Healthcare units or the ACE may refuse to provide with you a copy of your personal data subject to processing if your access thereto adversely

affects the rights or freedoms of others, including the rights or freedoms of CUF Healthcare units and the ACE themselves. In this way, trade secrets pertaining to CUF could be revealed or its intellectual property rights could be infringed. In such cases, the Controller may ask that you specify the information or processing activities to which the request relates, so that the former is able to provide you with the requested information.

Withdrawing your consent

The law also guarantees you the right to, by the aforementioned means, withdraw your consent to the processing of data regarding which the consent is the legitimate basis therefor. To this end, you have the right to withdraw your consent at any time, which shall not affect the processing carried out so far based on consent before its withdrawal.

If you would like to stop receiving marketing communications from us, simply click the unsubscribe link at the bottom of any marketing communication sent by CUF.

If you have a MyCUF account, you can easily manage your marketing preferences, as well as those of your direct relatives in the descending and ascending lines, by logging in to your account and accessing your Personal Area, where you can, at any time, choose to stop receiving marketing communications, by clicking in the section of communication management of your account.

Erasure

The Customer shall also have the right to request, at any time, the erasure of personal data concerning him or her, including the erasure of the MyCUF account itself, in accordance with the law. However, the Controller may, in each case, refuse to accept the request for erasure of data in certain situations, notably whenever *(i)* the data are still necessary in relation to the purposes for which they were collected, or *(ii)* the processing is not based on the consent or the pursuit of legitimate interests of the Controller, or *(iii)* the data have not been unlawfully processed, or *(iv)* the processing is necessary for the establishment, exercise or defence of legal claims, or *(v)* the data are necessary for the purpose of preventive medicine, medical diagnosis, provision of healthcare or treatments, or system and healthcare service management.

Rectification and restriction of, and objection to the processing and portability

Data subjects have the right to, in accordance with the applicable law, request the rectification of their personal data and the restriction of processing, as well as to object to such processing or obtain the portability of their data, provided that the conditions laid down in the law are met, pursuant to the GDPR, if they provide grounds relating to their particular situation. To this end, you must submit a request addressed to the contacts listed above. In such an event, the Controller may present compelling legitimate grounds for the continuance of the processing, in which case the Controller reserves the right to continue the processing of your data for said purposes, such as in the cases where such processing is necessary for the establishment, exercise or defence of legal claims.

Submission of a complaint to the Supervisory Authority

Without prejudice to any other administrative or judicial remedy, the data subject shall have the right to lodge a complaint with the CNPD or other competent supervisory authority under the law, if the data subject considers that his/her data are not being legitimately processed by CUF, pursuant to the applicable legislation or this Policy.

Users of CUF platforms

This Privacy Policy shall apply in full to all users of CUF Platforms. However, given the specific nature of the use of such digital platforms (notably, the websites and applications Saúde CUF, such as MyCUF and chatbot), rules should be laid down regarding certain matters of particular relevance in this regard.

CUF is fully aware that the provision of personal information is a matter of great concern to our Customers who use the Internet. As such, all the personal data collection forms in all of our websites and applications require a browser-encrypted connection , meaning that all personal data that you provide to us will be safely stored in our systems, which incorporate the best technical and procedural safety practices aimed at safeguarding your personal data.

We provide links for third-party websites in our Platforms, which are subject to different Privacy Policies. Please bear in mind that this Privacy Policy does not apply to such websites and that CUF entities shall not be responsible for any collection of your information by said third parties through their websites , and it is therefore recommended that you read the privacy policy of such third parties.

For your protection, the access to certain features of our Platforms (notably the visualisation of further diagnostic examinations through MyCUF) is password-protected , which should not be shared with anyone. For safety reasons, we recommend that you memorise your password and change it regularly.

We only request your credit/debit card details in the event that you wish to pay for a medical appointment or procedure performed in one of CUF Healthcare units; to this end, the use of our Platforms is secured by SSL (Secure Socket Layer) technology, which encodes all communications between your personal computer and our server, to prevent them from being intercepted.

What are the security measures adopted by the CUF Healthcare units?

CUF is committed to ensuring the confidentiality, protection, and security of the personal data of its Customers, by implementing the appropriate technical and organisational measures to protect their data from any form of undue or illegitimate processing and any accidental loss or destruction of such data. To this end, we have systems and teams in place to ensure the security of all personal data processed, aimed at carrying out impact assessments on data protection, establishing and updating procedures that prevent unauthorised access, accidental loss and/or destruction of personal data, thereby undertaking to comply with the legislation on personal data protection of the Customer and to process such data solely for the purposes for which they were collected, as well as to ensure that these data are processed with appropriate levels of security and confidentiality.

As we are fully aware of the sensitive nature of this information, we have developed personal data protection procedures and disclosed them to all our employees, with a view to guaranteeing that they have full knowledge of the obligations imposed upon them in this regard. In order to ensure the continuous awareness of our employees regarding this matter, we also promote training programmes and require our employees to undertake to refrain from disclosing to any third parties or use for unlawful purposes any personal information of CUF Customers, of which they may become aware as a result of the performance of their duties.

In this regard, CUF has also appointed a Data Protection Officer or “DPO”

As explained in this Privacy Policy (see section “UNDER WHAT CIRCUMSTANCES ARE DATA PROVIDED TO OTHER ENTITIES?” below), in certain cases we may provide your personal data to third parties. CUF has set out

clear rules to subcontract the processing of personal data to its processors, which require the latter to adopt the appropriate technical and organisational measures to protect your personal data.

Under what circumstances are data provided to other entities?

CUF Healthcare units and the ACE engage other entities to provide certain services. The provision of such services might involve access to our Customers' personal data by said entities. Such is the case of entities providing IT support services to CUF Healthcare units, as well as certain medical equipment suppliers, clinical service providers in certain Services, consultancy and law firms, and third-party entities responsible for managing the physical archives of CUF Healthcare units.

Therefore, any processor engaged by a CUF entity shall process the personal data of our Customers, for us and on our behalf, under the strict obligation to follow our instructions. CUF shall ensure that such processors provide sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of the applicable laws and ensure the security and protection of the rights of data subjects, pursuant to the processor agreement concluded with said processors.

CUF may also disclose personal data of its Customers to third-party entities whenever it deems that such data disclosures are necessary or appropriate *(i)* in light of the applicable laws, *(ii)* to comply with any legal obligations/court orders, *(iii)* respond to requests of public or governmental authorities, or *(iv)* to certify, assess, and measure the service levels of CUF Healthcare units.

As such, CUF may disclose your personal data to the Portuguese Health Regulatory Authority (ERS), the Portuguese Central Administration for the Health System (ACSS), the Shared Services of the Portuguese Ministry of Health (SPMS), the National Authority of Medicines and Health Products (INFARMED) or the Regional Health Administration Bodies [*Administrações Regionais de Saúde*], the Courts, Enforcement Agents, the criminal police or the Portuguese Public Prosecution Service whenever it is notified to do so or if such disclosure is necessary to comply with a legal obligation, as provided for by law.

If you would like the services provided by the CUF health unit to be covered by your insurance or health subsystem, your personal data, including health data related to such services, may be communicated to the Insurance Company or to the health subsystem of which you are a beneficiary, and this must remain confidential.

In any of the cases referred to above, CUF undertakes to adopt all reasonable measures to ensure that all personal data processed by it are effectively protected.

Under what circumstances may your data be subject to international transfers?

International transfers are transfers of personal data which are subject to processing or are intended for processing after transfer to a third country (located outside the European Union) or to an international organisation, which may occur between two or more controllers or between controllers and processors;

In order to obtain certification, assess, and measure the service levels of CUF Healthcare units, these may transfer some of your personal data to third countries (outside the European Union or the European Economic Area).

In such cases, CUF will implement the necessary and appropriate measures in light of the applicable law to ensure the protection of personal data being transferred, and will strictly comply with the legal provisions on the requirements applicable to such transfers, notably by previously notifying the Customers in this regard.

Contact Us

You can contact the Data Protection Officer ("DPO") of CUF for more information regarding the processing of your personal data, as well as for any questions regarding the exercise of the rights granted to you by the applicable legislation and particularly those referred to in this Privacy Policy, using the following contact details:

Through the designated form on the Site - Subject: Data protection.

Address: Avenida do Forte, nº 3 - Edifício Suécia III, Piso 2 - 2790-073 CARNAXIDE

How can you keep up-to-date with any changes to our privacy policy?

CUF reserves the right to amend or update this Privacy Policy at any time, which shall be accordingly updated in our Platforms. We suggest that you visit our Platforms on a regular basis, so that you can keep up-to-date with any changes.

Last updated: 07 December 2020.