

PRIVACY NOTICE

Budacare Medical Kft.
Consolidated and supplemented version

1. Introduction

Budacare Medical Kft. respects the privacy of its patients, clients, website visitors and other data subjects. This privacy notice explains, in a clear and transparent way, what personal data Budacare Medical Kft. processes, for what purposes, on what legal basis, for how long, who may access the data, and what rights data subjects may exercise.

Budacare Medical Kft. provides outpatient internal medicine specialist care, with related telemedicine services. At its premises it performs level 0 laboratory activity, in particular blood sampling; all further laboratory tests are provided through external partners.

2. Data controller details

Item	Details
Controller name	Budacare Medical Kft.
Registered office	2314 Halásztelek, Bánki Donát utca 6. 1. ajtó
Premises	1016 Budapest, Hegyalja út 7-13. 2. emelet
Tax number	29266333-2-13
Company registration number	13 09 223276
Statistical number	29266333 4690 113 13
Representative	Pócs Róbert, managing director
Electronic contact	robert@budacaremedical.hu

3. Scope and applicable law

This notice applies to all processing by Budacare Medical Kft. involving personal data of natural persons, including patients, clients, enquirers, website visitors and persons entering the clinic.

The processing is governed in particular by Regulation (EU) 2016/679 (GDPR), Act CXII of 2011 on Informational Self-Determination and Freedom of Information, Act CLIV of 1997 on Health, Act XLVII of 1997 on the processing and protection of health and related personal data, and other applicable healthcare, accounting and tax rules.

4. Data protection principles

Budacare Medical Kft. processes personal data lawfully, fairly and transparently. Processing is always carried out for specified, explicit and legitimate purposes. The scope of processed data is limited to what is necessary for the relevant purpose, the Controller keeps the data accurate and up to date, and stores it only for the required period.

The Controller applies appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, transfer, disclosure, erasure, destruction, loss or damage.

5. Purposes of processing, processed data, legal bases and retention periods

5.1 Contact, enquiries, appointment coordination and system messages

Item	Details
Purpose	Contact, answering enquiries, appointment coordination and sending system messages.
Legal basis	Performance of a contract or steps prior to contract under GDPR Article 6(1)(b); legitimate interest under Article 6(1)(f); consent under Article 6(1)(a) for optional data.
Data processed	Name, email address, telephone number and other information provided in the message.
Retention	Up to 5 years, or until expiry of the limitation period in case of a dispute.
Note	Newsletters or advertising communications are sent only on the basis of the data subject's prior consent.

5.2 Healthcare provision and medical documentation

Item	Details
Purpose	Outpatient internal medicine care, blood sampling, infusion therapy, keeping medical documentation, establishing diagnoses, preparing treatment plans, documenting care, meeting legal obligations, EESZT reporting and document upload, and fulfilling financial and accounting obligations.
Legal basis	For health data: GDPR Article 9(2)(h); legal obligation under Article 6(1)(c); contract performance under Article 6(1)(b); accounting documents under Article 6(1)(c).
Data processed	Identification data (name, place and date of birth, mother's name), contact details, address, invoicing data, Hungarian social security number (TAJ) or document number, copy of the identity document shown for identification (ID card or passport), medical history and condition, diagnoses, findings, therapy data, referrals, test results and clinic administration data.
Retention	Outpatient documentation: 30 years. Diagnostic findings: 30 years. Discharge summary, if created: 50 years. Referral, medicine, medical aid and care data: 5 years or until the end of the use period if longer. Invoices and accounting documents: 8 years.

5.3 Copies of identity documents

Item	Details
Purpose	Confirming the patient's identity, accurate identification necessary for healthcare, patient safety and completeness of medical documentation.
Legal basis	Legal obligation under GDPR Article 6(1)(c), legitimate interest under Article 6(1)(f), and, in relation to medical documentation, Article 9(2)(h).
Data processed	Paper copy of the identity card and/or passport and the identification data shown on the document.
Data subjects	All patients treated by Budacare Medical Kft.
Storage	On paper, as part of the patient documentation.
Access	Only authorised staff working on site.
Retention	According to the retention period applicable to medical documentation.

5.4 Medical documents submitted by the data subject

Item	Details
Purpose	Providing healthcare, reviewing medical history, supporting diagnosis and therapy decisions, and keeping medical documentation.
Legal basis	For health data: GDPR Article 9(2)(h); GDPR Article 6(1)(b) and (c).
Data processed	Medical documents, findings, medical records, referrals, discharge summaries, test results and the personal and health data contained in them, submitted electronically or otherwise by the data subject.
Start of processing	When the documents are received by Budacare Medical Kft.
Retention	According to the retention period applicable to medical documentation.

5.5 Telemedicine

Item	Details
Purpose	Remote consultation, medical advice and healthcare via telemedicine. Budacare Medical Kft., cgjsz.: 13-09-223276, Telephely: 1016 Budapest, Hegyalja út 7-13. 2. emelet

Item	Details
Platform	Telemedicine is provided exclusively through the Medio system.
Legal basis	For health data: GDPR Article 9(2)(h); GDPR Article 6(1)(b) and (c).
Data processed	Identification data, contact details, address and invoicing data, TAJ number or document number, medical history and condition, diagnoses, findings, therapy data, referrals, test results, clinic administration, and technical and metadata of the video connection.
Retention	According to the retention periods applicable to medical documentation. If the call is not recorded, only administrative and medical documentation data remain.

5.6 Appointment booking via web interface, mobile phone and the Medio application

Item	Details
Purpose	Appointment booking, managing, changing and cancelling bookings, and contact.
Legal basis	Consent under GDPR Article 6(1)(a); when healthcare is used, Article 6(1)(b) and (c).
Data processed	Mandatory data: surname, first name, email address, telephone number. Optional administrative data: mother's name, place of birth, date of birth, TAJ number, ID document number.
Data transfer	The data subject consents to Budacare Medical Kft. transferring the necessary personal data to its current healthcare partners for the purpose of appointment booking and arranging healthcare. Such partners include laboratory, diagnostic and specialist medical service providers.
Retention	Immediately after registration deletion, with a maximum of 1 year for quality assurance. After healthcare has been provided, data are retained according to the retention periods applicable to medical documentation.

5.7 EESZT reporting and document upload

Item	Details
Purpose	Statutory health data reporting to the Electronic Health Service Space (EESZT), uploading health documents and documenting care events.
Legal basis	Legal obligation under GDPR Article 6(1)(c); for health data Article 9(2)(h) and (i).
Data processed	Identification and health data, care events, findings, outpatient records and other medical documents to be sent to EESZT under the law.
Recipient	EESZT and organisations specified by law in connection with its operation.
Retention	According to the statutory retention periods applicable to EESZT and medical documentation.

5.8 Newsletter and direct marketing

Item	Details
Purpose	Sending newsletters and direct marketing communications.
Legal basis	Consent under GDPR Article 6(1)(a).
Data processed	Name and email address.
Retention	Until withdrawal of consent.
Note	Consent may be withdrawn at any time; withdrawal does not affect the lawfulness of processing before withdrawal.

5.9 Website operation and cookies

Item	Details
Purpose	Ensuring website operation, preparing visitor statistics and improving user experience.
Cookies used	Essential cookies and Google Analytics analytical cookies.
Legal basis	For essential cookies: legitimate interest under GDPR Article 6(1)(f). For Google Analytics and other analytical cookies: consent under Article 6(1)(a).
Data processed	Device and browser data, IP address, session ID, page usage data and cookie identifiers.
Retention	Session cookies until the end of the session; persistent cookies for the period set in the browser or cookie banner; analytical cookies until consent is withdrawn or for the period set in the cookie.
Note	Analytical cookies require consent, which the data subject may withdraw at any time. Budacare Medical Kft., cgjsz.: 13-09-223276, Telephely: 1016 Budapest, Hegyalja út 7-13. 2. emelet

5.10 Camera system

Item	Details
Purpose	Property protection, personal and patient safety, and investigation of possible extraordinary events.
Number of cameras	5 cameras.
Monitored area	Only the clinic corridors and passage areas. No camera operates in examination rooms, treatment rooms, toilets, changing rooms or other areas with a higher expectation of privacy.
Audio	The camera system does not record sound.
Legal basis	Legitimate interest under GDPR Article 6(1)(f). The Controller's legitimate interest is ensuring the safety of persons on the premises, property protection, and the ability to investigate complaints, incidents and legal claims. The Controller prepares and keeps a legitimate interest assessment for the camera processing.
Data processed	Image and movement of persons entering the camera field of view, and the place and time of the recording.
Storage	Stored on an internal storage device in a closed system.
Access	Only the managing director may access the recordings.
Retention	20 days. The reason for this retention period is that the Controller works to a significant extent with foreign patients, so a complaint, investigation or legal claim may arise or be reported only after the patient has returned home. Depending on available storage, the camera system automatically overwrites or deletes recordings after no more than 20 days, unless the recording is needed for a legal claim, official procedure or investigation of an extraordinary event.
Information	Persons entering the clinic must be informed of camera surveillance by a clearly visible pictogram and short notice referring to the full notice.

5.11 Payment and invoicing data

Item	Details
Purpose	Managing payments, issuing invoices and complying with accounting and tax obligations.
Legal basis	Contract performance under GDPR Article 6(1)(b); legal obligation under Article 6(1)(c).
Data processed	Name, billing address, payment data, bank account or card data at the payment service provider, invoice data.
Recipients	Payment service provider, accounting or invoicing service provider, competent authority under the law.
Retention	Accounting documents: 8 years.

6. Source of personal data

As a rule, personal data are obtained from the data subject, for example during appointment booking, contact, provision of care or document submission. In the case of a corporate order, the source may be the company acting as an independent controller. During healthcare, data may also come from other healthcare providers, laboratories, diagnostic partners, EESZT or previous documentation submitted by the data subject.

7. Processors and service providers

The Controller may use external service providers and processors, especially for hosting, web development, appointment booking systems, payment services, laboratory, diagnostic and other healthcare services. The Controller selects providers carefully and requires them by contract to keep data confidential and comply with applicable laws.

Service	Provider
Hosting	DigitalOcean LLC, 101 Avenue of the Americas, 10th Floor, New York, NY 10013, United States. Physical storage location: EU / Frankfurt am Main. privacy@digitalocean.com , digitalocean.com
Web development and support	Calvus Communications Kft., 1134 Budapest, Róbert Károly krt. 41., calv.us
Appointment booking and telemedicine system	Medio Medtech Zrt., 1095 Budapest, Lechner Ödön fasor 2. 7th floor 13., info@mymedio.hu , mymedio.hu
Payment service provider	SimplePay Zrt., 1138 Budapest, Váci út 135-139. B. ép. 5. em., simplepay.hu

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Service	Provider
Laboratory service provider	SYNLAB Hungary Kft., 1211 Budapest, Weiss Manfréd út 5-7., synlab.hu
Laboratory service provider	CORDEN INTERNATIONAL /Magyarország/ Kft., 1117 Budapest, Fehérvári út 84/a., corden.hu
Specialist medical partner	Emineo Kft., 1117 Budapest, Nádorliget utca 8. B. ép. fszt. 1.; sites: 1016 Budapest, Hegyalja út 7. and 1016 Budapest, Hegyalja út 9.; emineo.hu
Diagnostic partner	Margit Medical Center / Üromed Diagnosztika Kft., registered office: 1065 Budapest, Podmaniczky utca 1-3. 2nd floor 19.; site: 1027 Budapest, Henger utca 2. B. ép. fszt.; margitmedical.hu

8. Data transfers to other controllers

The Controller transfers personal data to other controllers where necessary for contract performance, arranging or providing healthcare, where required by law, where the Controller or a third party has a legitimate interest, or where the data subject has consented.

When arranging healthcare, the Controller may transfer necessary data to its current healthcare partners, especially laboratory, diagnostic and specialist providers. Such partners may also act as independent controllers for their own activities and process data under their own privacy notices.

On the basis of legal obligation, data may be transferred to EESZT, authorities, courts, health insurance bodies or other statutory organisations.

9. Transfers outside the EEA

As a rule, the Controller processes and stores personal data within the European Economic Area. If a transfer outside the EEA occurs through a service provider or subcontractor, the Controller ensures that the transfer is made with GDPR-compliant safeguards, such as an adequacy decision, standard contractual clauses or another lawful safeguard.

10. Log files

When the website is used, the browser sends certain technical information that the Controller may store in log files. Log files are used to ensure website operation, investigate errors, detect abuse and attack attempts and fulfil IT security purposes.

The log files may include the device IP address, referring page address, internet service provider, names of accessed files or information, date and time of access and its duration, amount of data transferred, operating system and browser data, and HTTP status codes.

The Controller retains log files for a maximum of 30 days, unless further retention is necessary due to a security incident, legal claim or official procedure.

11. External links

The website may contain links to websites operated by external service providers. After opening such links, the Controller has no influence over the processing of personal data by the external provider. Such processing is governed by the privacy notice of that external provider.

12. Data security

The Controller's employees, contributors and service providers are subject to confidentiality obligations. The Controller applies appropriate technical and organisational measures to protect personal data, especially against unauthorised access, disclosure, alteration, erasure, destruction, loss or damage.

The Controller designs security measures proportionately to the risks and reviews them where necessary.

13. Rights of data subjects

The data subject may exercise the following rights through the Controller's contact details. Before fulfilling a request, the Controller may ask the data subject to prove their identity.

- Right to information and access: the data subject may request information on whether the Controller processes their personal data and may request access to the data.
- Right to rectification: the data subject may request correction of inaccurate personal data and completion of incomplete data.
- Right to erasure: the data subject may request erasure of personal data if the legal conditions are met. This does not affect data that must be retained by law, for example medical or accounting documentation.
- Right to restriction: the data subject may request restriction of processing if the legal conditions are met.
- Right to object: the data subject may object to processing based on legitimate interest. The Controller may then process the data only if it proves compelling legitimate grounds overriding the interests, rights and freedoms of the data subject.
- Right to withdraw consent: if processing is based on consent, consent may be withdrawn at any time. Withdrawal does not affect the lawfulness of processing before withdrawal.
- Right to data portability: where processing is based on consent or contract and is automated, the data subject may request the data provided by them in a structured, commonly used, machine-readable format.

14. Right to lodge a complaint

The data subject may lodge a complaint with the supervisory authority if they consider that the processing of their personal data infringes applicable data protection laws.

Item	Details
Authority	Hungarian National Authority for Data Protection and Freedom of Information
Registered office	1055 Budapest, Falk Miksa utca 9-11.
Postal address	1363 Budapest, Pf. 9.
Telephone	+36 (1) 391-1400
Email	ugyfelszolgalat@naih.hu
Website	www.naih.hu

15. Contact

If the data subject wishes to contact the Controller or exercise their rights relating to data processing, they may do so through one of the contact details specified in Section 2 of this notice.

Dated: Budapest, 13 May 2026