

## Privacy Policy

The Manager is concerned about the confidentiality and protection of the User's personal data, complies with the User's rights to lawful processing of personal data in accordance with applicable laws, including the Regulation of the European Parliament and the Council of April 27, 2016, No. 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (Regulation), and other applicable laws in the field of privacy and data processing.

In view of the foregoing, the Manager has developed this privacy policy in order to provide information provided for by the Regulations.

### 1. Personal data processing Manager:

1.1. The Manager of personal data processing is SIA "VESELĪBAS CENTRS MC", registration number: LV41503034796, legal address Lachplesha 36/38-4, Daugavpils, LV-5401, telephone: 28448212 (hereinafter referred to as "VESELĪBAS CENTRS MC"), homepage: [www.veselibascentrs-mc.lv](http://www.veselibascentrs-mc.lv).

### 2. Processor of personal data:

2.1. VESELĪBAS CENTRS MC processes the personal data of the Clients in the scope and in the manner determined and permitted by the laws and regulations of the Republic of Latvia and the European Union. Other personal data processors of VESELĪBAS CENTRS MC also have the right to receive and process customer data. For more information about cooperation partners, please contact VESELĪBAS CENTRS MC using the indicated communication channels (see the "Contacts" section on the VESELĪBAS CENTRS MC website [www.veselibascentrs-mc.lv](http://www.veselibascentrs-mc.lv)).

### 3. Applicable laws:

3.1. Regula;

3.2. Law on the processing of personal data;

3.3. Patient's rights law;

3.4. Treatment law;

3.5. Children's right law.

### 4. What is the Privacy Policy?

4.1. The Privacy Policy (hereinafter referred to as the “Policy”) provides information on how VESELĪBAS CENTRS MC collects, processes, stores, transfers, deletes and protects the personal data of the Clients, thereby ensuring that the personal data of the Clients are processed legally, in good faith, honestly and transparently for the Clients. The Policy applies to personal data of Clients, any processing of personal data and services provided to Clients.

4.2. If VESELĪBAS CENTRS MC updates this policy, all changes will be published on the IVAKO GROUP website [www.veselibascentrs-mc.lv](http://www.veselibascentrs-mc.lv) , in the “Our Center” section – “Privacy Policy”.

5. What personal data does VESELĪBAS CENTRS MC process?

5.1. The categories of personal data processed by VESELĪBAS CENTRS MC depend on the services provided to the Clients. VESELĪBAS CENTRS MC has the right to process the following categories of personal data for the purposes specified in clause 7 of this Policy:

5.1.1. name, surname, personal code/date of birth, correspondence address, telephone number and e-mail address;

5.1.2. bank details;

5.1.3. data of identity documents (document number, date and place of issue, etc.);

5.1.4. data that the Client himself/herself provides to VESELĪBAS CENTRS MC;

5.1.5. CCTV recordings and images;

5.1.6. surveys/questionnaires filled in by the Client.

5.2. VESELĪBAS CENTRS MC processes the following data on the use of services for the purposes specified in clause 7 of this Policy:

5.2.1. cookies (website browsing data) – data on visiting the VESELĪBAS CENTRS MC website ([www.veselibascentrs-mc.lv](http://www.veselibascentrs-mc.lv)) (hereinafter referred to as the "VESELĪBAS CENTRS MC Website").

6. What is the legal basis for processing the Client's personal data?

6.1. Consent of the Customer - The Customer, as the subject of personal data, gives his consent to the collection and processing of personal data for certain purposes. The consent of the client is his free will and independent decision, which can be given at any time, which allows VESELĪBAS CENTRS MC to process personal data for the specified purposes. The Client's consent is mandatory if it is given in writing (by filling out the form in the VESELĪBAS CENTRS MC private clinic, by sending an electronic request for the Client's identification or by using the website [www.veselibascentrs-mc.lv](http://www.veselibascentrs-mc.lv) ). The Client has the right to revoke his previously given consent at any time using the indicated channels (see the "Contacts" section on the VESELĪBAS CENTRS MC website [www.veselibascentrs-mc.lv](http://www.veselibascentrs-mc.lv) ). The requested changes will take effect within

three business days. The withdrawal of consent does not affect the lawfulness of processing based on consent prior to withdrawal.

6.2. Conclusion and performance of the contract – in order for VESELĪBAS CENTRS MC to be able to conclude and fulfill the contract with the Client, providing quality services and servicing the Client, it must collect and process certain personal data that is collected before the conclusion of the contract with VESELĪBAS CENTRS MC or during the already concluded contract.

6.3. Legitimate interests of VESELĪBAS CENTRS MC - respecting the interests of VESELĪBAS CENTRS MC, which are based on the provision of quality services and timely support to the Client, VESELĪBAS CENTRS MC has the right to process the Client's personal data to the extent that is objectively necessary and sufficient for him in accordance with clauses 7.1.-7.3 of this Policy. The legitimate interests of VESELĪBAS CENTRS MC include the processing of personal data in the course of direct marketing, as a result of which new and/or separate offers of VESELĪBAS CENTRS MC services are presented to the Client (see also clauses 8.2 and 8.3 of this Policy).

6.4. Compliance with legal obligations – VESELĪBAS CENTRS MC has the right to process personal data in order to comply with the requirements of regulatory enactments, as well as to respond to legal requests from the state and local government.

6.5. Protection of vital interests – VESELĪBAS CENTRS MC has the right to process personal data to protect the vital interests of the Client or another natural person, for example, if video recording data is necessary for the prevention and disclosure of criminal offenses.

7. For what purposes will VESELĪBAS CENTRS MC process personal data of Clients?

7.1. VESELĪBAS CENTRS MC processes personal data to ensure the provision of quality services during the term of the contract with VESELĪBAS CENTRS MC:

7.1.1. to handle customer complaints and provide support (including technical) in connection with the services provided;

7.1.2. for effective cash flow management, including for managing payments and customer debts;

7.1.4. for security surveillance.

7.2. VESELĪBAS CENTRS MC processes personal data in order to promote the development of the industry and offer new services to Clients, including:

7.2.1. to create new services and make proposals for them;

7.2.2. statistical data of VESELĪBAS CENTRS MC clients are processed for market analysis and business model development.

7.3. VESELĪBAS CENTRS MC processes personal data in order to create and maintain VESELĪBAS CENTRS MC internal processes, ensure document management and other internal processes (for example, archiving contracts and other documents) to the extent necessary and sufficient.

7.4. VESELĪBAS CENTRS MC has the right to process data for the following purposes, as well as for other purposes, upon receipt of voluntarily given and unambiguous consent from the Client:

- 7.4.1. verification of the client's personal data in debt history databases before concluding an agreement in order to assess the client's ability to fulfill contractual obligations, and during the term of the agreement such verification is necessary to offer the client new, more modern services;
- 7.4.2. promote recognition of the VESELĪBAS CENTRS MC image in the market by sending good wishes to Clients, awarding bonuses, organizing surveys to improve existing services, as well as creating new services.

## 8. Имеет ли Клиент право ограничить обработку своих данных?

8.1. Profiling personal data of customers as data processing:

8.1.1. profiling - any kind of automated processing of personal data that manifests itself in the use of personal data for the purpose of assessing specific aspects of a person relating to a natural person, in particular analyzing or predicting aspects related to the personal wishes, interests, reliability of the said natural person, behavior, location or movement;

8.1.2. VESELĪBAS CENTRS MC, when processing personal data of Clients, may perform profiling in order to create and express individual offers. Automated individual decisions are made solely for business purposes and do not create legal consequences for the Client. The Client has the right to object to the adoption of an automated decision at any time and not be the subject of such a decision, informing VESELĪBAS CENTRS MC about it (see also the rules of clause 8.3 of this Policy).

8.2. Direct marketing and the basis for sending commercial messages to Clients: VESELĪBAS CENTRS MC conducts direct marketing by distributing commercial messages to Clients so that Clients are always informed about new and/or services created directly for Clients, as well as about special contract conditions (for example, discounts) in accordance with clause 6.3 of this Policy. The basis for the processing of personal data specified in clause Clients have the right to refuse to receive commercial communications at any time and free of charge by informing VESELĪBAS CENTRS MC about this (see also the rules of clause 8.3 of this Policy).

8.3. Clients have the right at any time to object to the profiling of their personal data (see clause 8.1) or refuse to receive commercial notifications (see clause 8.2), informing IVAKO GROUP orally (during a telephone conversation after identifying the Client by

phone 28448212) or in writing (by filling out a form at the VESELĪBAS CENTRS MC center, by sending an electronic request to [veselibascentrsmc@gmail.com](mailto:veselibascentrsmc@gmail.com)) or by visiting the center. The requested changes will take effect within three working days. The changes will not affect the legality of personal data processing until the moment of objections and/or refusal of the Customer specified in this paragraph.

## 9. What are cookies and how can VESELĪBAS CENTRS MC process them?

9.1. Cookies are small data files that are essential for providing certain website features (such as logging in). Cookies allow websites to remember various settings such as language, font and other options you choose when displaying web pages. This is why cookies are stored on your computer. This is how most major web pages and service providers operate.

9.2. Cookies are used to process the general behavior of users and websites:

usage history, diagnoses problems and shortcomings in the operation of the site, collects statistics on user behavior, and also ensures full and convenient use of the site's functionality.

9.3. You can delete any cookies that are already on your computer. Most browsers also provide the option to block cookies from being placed on your computer, but if you do this you may not be able to use all of our online services. More information about the cookie settings in your browser can be found on the website of the web browser developer. The website maintained by VESELĪBAS CENTRS MC uses functional, analytical, advertising and mandatory cookies. To learn more about cookies, visit the VESELĪBAS CENTRS MC website [www.veselibascentrs-mc.lv](http://www.veselibascentrs-mc.lv) in the "Privacy Policy" section.

## 10. How does VESELĪBAS CENTRS MC receive personal data of Clients?

10.1. VESELĪBAS CENTRS MC receives personal data of Clients when Clients:

10.1.1. purchase VESELĪBAS CENTRS MC services (in the VESELĪBAS CENTRS MC center or remotely, by preliminary identification of the Client);

10.1.2. request additional information about the service from VESELĪBAS CENTRS MC or contact VESELĪBAS CENTRS MC in connection with a complaint or request for information identifying the Client;

10.1.3. participate in surveys;

10.1.4. visit or browse the VESELĪBAS CENTRS MC website;

10.1.5. are filmed using VESELĪBAS CENTRS MC video surveillance equipment on the territory of VESELĪBAS CENTRS MC.

10.2. VESELĪBAS CENTRS MC may process the Client's personal data received from third parties if the Client has given consent to this (for example, from owners of debt history databases, etc.).

11. What is the processing time for the Client's personal data?

11.1. VESELĪBAS CENTRS MC will process the Client's personal data as long as at least one of the following circumstances exists:

11.1.1. the agreement between the Customer and VESELĪBAS CENTRS MC is valid;

11.1.2. the period of storage of personal data is determined or follows from the regulatory enactments of the Republic of Latvia and the European Union;

11.1.3. if necessary, to implement and protect the legitimate interests of VESELĪBAS CENTRS MC;

11.1.4. until the withdrawal of the Client's consent to the processing of personal data.

Customer personal data is deleted no later than three months after the original reason for retaining the data ceases to be valid, unless we are legally required to retain this data in the future (for example, but not limited to accounting or legal proceedings).

12. Transfer of personal data of Clients:

12.1. In order to provide services to Clients, VESELĪBAS CENTRS MC may transfer personal data of Clients:

12.1.2. partners or institutions involved in the provision of services ordered or used by Clients;

12.1.3. debt collection companies, credit bureaus, debt recorders or other debt collection organizations;

12.1.4. successors – in order to ensure effective cash flow management, VESELĪBAS CENTRS MC has the right to assign the rights of claim against the debtor or debtors.

12.2. VESELĪBAS CENTRS MC is obliged to provide information about personal data to the following institutions and services:

12.2.1. law enforcement agencies, courts or other state and local government institutions, if this arises from regulatory enactments or a request for information from the relevant institution;

12.3. VESELĪBAS CENTRS MC will provide personal data of Clients only to the extent necessary and sufficient in accordance with the requirements of regulatory enactments and the objective conditions of a particular situation.

12.4. VESELĪBAS CENTRS MC reserves the right, if necessary, to transfer personal data of Clients to other service providers, if this is necessary to provide Clients with better services. For information about debt collection agencies, credit bureaus, debt history database holders or other debt collection organizations, successors, please contact VESELĪBAS CENTRS MC using the indicated communication channels (see the "Contacts" section on the VESELĪBAS CENTRS MC website [www.veselibascentr-mc.lv](http://www.veselibascentr-mc.lv) ).

13. How does VESELĪBAS CENTRS MC protect the personal data of its customers?

13.1. VESELĪBAS CENTRS MC provides, constantly reviews and improves security measures to protect the personal data of Clients from unauthorized access, accidental loss, disclosure or destruction. For this, VESELĪBAS CENTRS MC uses modern technologies, technical and organizational requirements, i.e. see use of firewalls, intrusion detection, analysis software, and data encryption.

13.2. VESELĪBAS CENTRS MC carefully checks all service providers that process the Client's personal data on behalf and on behalf of VESELĪBAS CENTRS MC, and also evaluates whether cooperation partners (personal data processors) apply appropriate security measures so that the processing of the Client's personal data takes place in accordance with the delegation of VESELĪBAS CENTRS MC and regulatory requirements. Cooperation partners are not entitled to process the Client's personal data for their own purposes.

13.3. VESELĪBAS CENTRS MC is not responsible for unauthorized access to personal data and/or loss of personal data if it is beyond the control of VESELĪBAS CENTRS MC, for example, due to the fault and/or negligence of the Client.

13.4. VESELĪBAS CENTRS MC will notify the Client in the event of a threat to the Client's personal data.

14. What rights do clients have?

14.1. Contact VESELĪBAS CENTRS MC to obtain a copy of the personal data held by VESELĪBAS CENTRS MC.

14.2. Correct all personal data about yourself stored by VESELĪBAS CENTRS MC by submitting an application for change, by sending an electronically signed letter to [veselibascentrsmc@gmail.com](mailto:veselibascentrsmc@gmail.com), by calling 28448212 or by visiting a VESELĪBAS CENTRS MC center.

14.3. Clients have the right to receive information about those individuals or legal entities who received information about them from VESELĪBAS CENTRS MC within a certain period of time. VESELĪBAS CENTRS MC will not provide Clients with information about state institutions that are the initiators of criminal proceedings,

subjects of operational activities or other institutions, the disclosure of such information about which is prohibited by law.

14.4. Request the deletion or restriction of the processing of personal data, the processing of which is no longer required in accordance with the purposes for which they were collected and processed (right to be "oblivious").

14.5. Regarding the processing of personal data, please contact VESELĪBAS CENTRS MC or the institution supervising the processing of personal data (State Data Inspectorate, [www.dvi.gov.lv](http://www.dvi.gov.lv)).

14.6. Contact the data protection specialist of VESELĪBAS CENTRS MC to receive information about the processing and protection of the client's personal data.

14.7. Get access to your personal data within a month from the date of submission of the relevant request. The Client can apply for the exercise of his rights in writing in person, at the legal address of the Manager (by presenting an identity document) or by e-mail, signing with a secure electronic signature. Upon receipt of the Client's request to exercise his rights, the Manager shall verify the Client's identity, evaluate the request and fulfill it in accordance with the laws and regulations.

## 15. Providing telemedicine and educational process.

15.1. To provide quality customer service, we organize remote healthcare services: consultations and classes of a physical and rehabilitation medicine doctor, a physiotherapist, as well as training services, which are also available on the cloud video and voice platforms Zoom or Microsoft Teams.

15.2. The current privacy policy for Zoom can be found [here](#), and the privacy policy for Microsoft Teams can be found [here](#). The developers of these platforms have confirmed in their privacy policy that they comply with the basic principles of personal data processing defined in the Regulations and other legal acts, thereby ensuring compliance with the Regulations.

VESELĪBAS CENTRS MC data protection specialist: Jolanta Volkovicha.

Notice on the use of cookies.

## MANAGER

1. The website <http://www.veselibascentrs-mc.lv/> (hereinafter referred to as the Site) collects data about Site visitors, which gives the Site administrator the opportunity to assess how useful the Site is and how it can be improved.

2. The controller that collects data about visitors to the Site is SIA IVAKO GROUP, registration number: LV41503034796 (hereinafter referred to as the Manager).



3. Manager's address: Lachplesha 36/38-023, Daugavpils, LV-5401, email address: [veselibascentrsmc@gmail.com](mailto:veselibascentrsmc@gmail.com), phone: 28448212.

## COOKIES

4. The Manager is constantly improving the Site in order to improve its use, so the Manager needs to know what information is important for visitors to the Site, how often they visit the Site, what devices and browsers they use, what region visitors come from and what content they like to read the most.

5. The Manager uses the Google Analytics system, which allows the Manager to analyze how visitors use the Site. You can learn more about how the core principles of Google Analytics work on the Google website [https://support.google.com/analytics/answer/1012034?hl=lt&ref\\_topic=6157800](https://support.google.com/analytics/answer/1012034?hl=lt&ref_topic=6157800).

The Manager uses the collected data for its legitimate interests in order to better understand the needs of visitors to the Site and improve the availability of information published by the Manager. Statistical data about visitors to the Site can only be accessed by the employees of the Manager responsible for the analysis of such data.

6. The server hosting the Website may record the requests sent by the visitor (device used, browser, IP address, date and time of access). The data referred to in this paragraph is used for technical purposes: to ensure the correct functioning and security of the Site, as well as to investigate possible security incidents. The basis for the collection of the data referred to in this paragraph is the Manager's legitimate interest in ensuring the technical availability and integrity of the Website.

7. Cookies are small files that the browser saves on the visitor's computer each time the visitor visits the Site, in the amount specified in the visitor's computer browser settings. Individual cookies are used to select and apply the information and advertisements offered to the visitor based on the content that the visitor has previously viewed and thus make the use of the Website simple, convenient and individually tailored to the visitor. For more information about cookies, as well as their deletion and management, please visit the home page [www.aboutcookies.org](http://www.aboutcookies.org).

8. The Site uses cookies to collect user IP addresses and browsing information, and to enable the Site to remember the visitor's choices. Cookies allow the Manager to monitor the Website's data flow and user interactions with the Website. The Manager uses this data to analyze visitor behavior and improve the Website. The legal basis for the use of cookies is the Manager's legitimate interest in ensuring the functionality, availability and integrity of the Site.

## TYPES OF COOKIES

9. Cookies can be divided into two main categories based on their expiration date: short-term cookies (stored on the computer until the web browser is closed and then deleted) and long-term (persistent) cookies (stored on the computer for a longer time). period of time (depending on your browser and cookie settings) or until they are manually deleted).

## OPT-OUT OF COOKIES

11. The user of the site has the right at any time to refuse consent to the creation, accumulation and processing of such statistical data by manually disabling the use of the cookie processing mechanism in the browser. You can change your cookie settings or delete them in your internet browser settings. We add links to resources with information about managing cookies for the most popular browsers:

Firefox – <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

Chrome – <https://support.google.com/chrome/answer/95647?hl=en>

Safari – <https://support.apple.com/lv-lv/guide/safari/sfri11471/mac>

Opera – <https://help.opera.com/en/latest/web-preferences/>

Edge – <https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy>

Explorer – [https://support.microsoft.com/en-us/help/278835/how-to-delete-cookie-files-in-internet-explorer\[VV4\]](https://support.microsoft.com/en-us/help/278835/how-to-delete-cookie-files-in-internet-explorer[VV4])

Vairāk informācijas, kā kontrolēt sīkdatnes atbilstoši ierīces pārlūkprogrammai, var atrast tīmekļvietnē: [www.aboutcookies.org](http://www.aboutcookies.org).

## OTHER RULES

12. Unless otherwise stated, cookies are stored for the duration of the validity period for which they were collected and then deleted.

13. The Manager confirms that cookies and statistical information will be collected, processed and stored in accordance with the requirements of the rules of the European Union, including the Regulation on the protection of personal data of the European Parliament and of the Council of 27 April 2016 no. 2016/679.

14. The Manager reserves the right to change these terms and conditions at any time. The visitor of the site is responsible for independently checking the content of the site in order to familiarize himself with changes in the rules.

