

PERSONAL DATA PROCESSING NOTICE

Valid from: 11.05.2020

Last updated: 18.08.2025

1. Notice on processing of personal data

- 1.1. **OÜ LOOTE ULTRAHELISKRIINING**, registry code 11665665, registered at A. H. Tammsaare tee 47, 11316 Tallinn, Estonia (hereinafter "**we**"), as the data controller, processes your personal data in accordance with this personal data processing notice and the applicable personal data protection legislation, in particular the General Data Protection Regulation (EU) 2016/679 (hereinafter "**GDPR**") and the Personal Data Protection Act of the Republic of Estonia.
- 1.2. This personal data processing notice is primarily aimed at:
 - our customers (including patients) and business partners, including representatives of legal entities and partners, and other contacts;
 - other persons whose personal data we process, including persons connected with a particular patient, and our website visitors.
- 1.3. In this personal data processing notice, you will find information on, among other things, how we collect and process your personal data and your rights as a data subject in relation to the processing of your personal data.

For the specific processing of personal data relevant to job applicants, please refer to the final part of this personal data processing notice.

Please read this personal data processing notice carefully. If you have any questions about this notice, the processing of your personal data or your rights, please contact us at info@ultraheli.ee. You can also contact our Data Protection Officer by email at andmekaitse@ultraheli.ee.

2. Collection and processing of personal data

- 2.1. We collect and process your personal data that we have received or collected:
 - directly from you as a data subject (e.g. by communicating directly with us in the context of a customer relationship or by using digital channels managed by us);
 - from our legal entity customers and business partners (for example when a legal entity provides us with your contact details as the contact person of that legal entity);
 - in some other way from our customers (including patients) (e.g. when a patient provides us with their child's information);
 - from the health information system or other national registers that aggregate data, if strictly necessary (first and foremost, for the purposes of the provision of healthcare);
 - by any other appropriate means (for example, by recording events organised by us).

3. Purposes of and legal basis for the processing of personal data

- 3.1. We will always process your personal data for a specific purpose and only include the personal data that is directly related to that purpose. Please note that in certain cases the transfer of your personal data to us is unavoidable, e.g. for the provision of a healthcare service or the fulfilment of an e-shop order, as well as to comply with legal requirements. If you do not provide us with the requested information, we may not be able to, for example, provide you with health services or fulfil your e-commerce order; you may, for example, be under an additional obligation to provide the relevant information to a competent authority yourself in the case of legal requirements, or it may cause delays in exercising your statutory rights.

3.2. With regard to data processing activities related to the provision of health services, we process the personal data of data subjects for the following purposes and on the following legal grounds, where applicable:

- organising the provision of health services, including the booking of appointments (Articles 6(1)(b) and 9(2)(h) of the GDPR in conjunction with the Health Services Organisation Act);
- essential provision of health services (Articles 6(1)(b) and 9(2)(h) of the GDPR in conjunction with the Health Services Organisation Act), in certain cases, e.g. when external business partners are involved with your consent (Articles 6(1)(a) and 9(2)(a) of the GDPR);
- monitoring and improving the quality of health services, including improving the patient experience by asking for and providing feedback (Articles 6(1)(f) and 9(2)(h) of the GDPR in conjunction with the Health Services Organisation Act; in certain cases regarding feedback, also consent in accordance with Articles 6(1)(a) and 9(2)(a) of the GDPR);
- planning of health care provision (Articles 6(1)(f) and 9(2)(h) of the GDPR in conjunction with the Health Services Organisation Act, consent after contract for provision of health services has ended, in accordance with Articles 6(1)(a) and 9(2)(a) of the GDPR);
- the general management of contractual relations and the organisation of services for the purpose of providing health care (Articles 6(1)(b) and 9(2)(h) of the GDPR in conjunction with the Health Services Organisation Act);
- in certain cases, we may rely on other purposes and legal grounds in the context of the provision of health services, for example, when processing personal data of a child of a recipient of health services (patient), we rely on the legitimate interest to enable the performance of a concluded contract for the provision of health services (Articles 6(1)(f) and 9(2)(h) of the GDPR in conjunction with the Health Services Organisation Act).

3.3. In connection with the provision of health services, the obligation to document (health) data relating to the service and patient safety incidents, we process personal data of data subjects, where relevant, for the following purposes and on the following legal grounds:

- documentation of health services provision and health data in both internal and national information systems or registers (Articles 6(1)(c) and 9(2)(h) of the GDPR in conjunction with the Health Services Organisation Act and the related implementing legislation);
- documentation of patient safety cases in both internal and national information systems or registers (Articles 6(1)(c) and 9(2)(h) of the GDPR in conjunction with the Health Services Organisation Act and related implementing legislation).

3.4. In relation with the fulfilment of orders placed in the e-shop, we process personal data of data subjects, where applicable, for the following purposes and on the following legal grounds:

- in the case of customers who are individuals, compliance with contractual obligations (Article 6(1)(b) GDPR), in the case of processing of health data, consent in accordance with Articles 6(1)(a) and 9(2)(a) of the GDPR);
- in the case of customers who are legal persons, a legitimate interest in the performance of contractual obligations (Article 6(1)(f) of the GDPR).

3.5. In connection with any other general processing activities, we process personal data of data subjects for the following purposes and on the following legal grounds, where applicable:

- the establishment, performance and general management of contractual relations with business partners who are legal persons, e.g. in relation to service providers and insurance undertakings (legitimate interest in pre-contractual measures, general management of contractual relations and performance of the contract in accordance with Article 6(1)(f) of the GDPR);
- recording our activities and events on the basis of a legitimate interest for the purposes of general marketing (Article 6(1)(f) of the GDPR);
- the provision of an information society (website) service (Article 6(1)(b) of the GDPR);

- tracking of website usage (cookies and other tracking technologies), for the purposes of implementing optional cookies and other tracking technologies (Article 6(1)(a) of the GDPR) – please see section 5 of this personal data processing notice for more details.

3.6. In connection with the contractual relationships and other processing activities described in sections 3.2 to 3.5 of this personal data processing notice, we process personal data of data subjects for the following purposes and on the following legal grounds, where applicable:

- settlement of contractual claims for payment: in the case of natural persons, for the performance of contractual obligations (Article 6(1)(b) of the GDPR); in the case of processing of health data, for enabling the provision of health services (Articles 6(1)(b) and 9(2)(h) of the GDPR in conjunction with the Health Services Organisation Act); in the case of customers who are legal persons and business partners, for legitimate interest in the performance of contractual obligations (Article 6(1)(f) of the GDPR);
- storing, maintaining and filing accounting records, tax returns and other tax-related documentation and statements in accordance with our legal obligations (Article 6(1)(c) of the GDPR in conjunction with relevant laws, e.g. the Accounting Act and the Taxation Act);
- the management of potential legal claims our legitimate interest in preparing, submitting and defending legal claims (Article 6(1)(f) of the GDPR), in the case of health data, Articles 6(1)(f) and 9(2)(f) of the GDPR).

4. Categories of personal data

4.1. In particular, for the purposes listed in section 3 of this personal data processing notice, we process the following personal data, where relevant:

- general identification data (including name, personal identification code or date of birth, contact details);
- (health) data related to the organisation of health services, including the booking of appointments, i.e. data provided by the patient when registering for an appointment (e.g. pregnancy status, reason for appointment, stage of pregnancy, appointment time);
- (health) data related to the actual provision of health services, including data collected in the context of the provision of health services (e.g. pregnancy and health records, anatomical-physiological and other indicators (including foetal indicators), ultrasound images and videos, pregnancy progress and related indicators, biometric data). The exact composition of your (health) data depends on the type of health services you receive;
- (health) data related to the monitoring and improvement of the quality of health services and the improvement of the patient experience, i.e. in addition to the data listed in the points above, other related data (patient identifiers, tests and analyses performed, findings and the related parameters);
- (health) data relating to the planning of the provision of health services, i.e. all the data listed in the points above;
- (health) data necessary for us to comply with our legal obligation to keep records, i.e., in addition to the data listed in the points above, where applicable, data relating to a patient safety case (in accordance with the legal requirements), logs to be kept (including system and data processing logs);
- (health) data related to the processing operations carried out in relation to the e-shop, i.e. general identification data (in the case of a customer who is a legal person, the legal entity and contact person data), contractual data (the fee to be paid, the nature of the contractual obligations, the delivery terms and address);
- (health) data related to the settlement of contractual claims, i.e. general identification data (in the case of a customer who is a legal person or a business partner, the relevant legal entity and its contact person data), contractual data, and bank account data;

- data relating to the recording of our activities and events, i.e. images in photographs and video footage;
- data relating to the use of the website and the provision of information society services, i.e. the user's activity on the website (including frequency or duration of use, preferences chosen), technical data of the device (e.g. IP address, browser type, operating system), data on the use of cookies.

4.2. We may also collect other personal information that you voluntarily provide to us.

5. Cookies and other tracking technologies

- 5.1. Subject to section 3.5 of this personal data processing notice, we may use cookies and similar tracking technologies on the website. Cookies are small text files that we may save on your device during your visit. We use cookies to make the website easier to use by, among other things, remembering your choices, making the website more efficient and user-friendly to use and navigate.
- 5.2. The types of cookies used on our website are divided into two categories:
- essential cookies necessary to enable the website to function properly, including navigating the website, using the features provided; and
 - optional cookies (e.g. preference, marketing and statistical cookies).
- 5.3. Optional cookies are non-mandatory. They will only be stored on your device if you give your consent in accordance with section 3.5 of this personal data processing notice. Optional cookies allow you to use certain features so that you can take full advantage of the website's functions. Optional cookies also allow us to analyse the performance of our website (e.g. by allowing us to see which sections of our website are the most popular, how much time visitors spend in each section, etc.). We may also use third-party cookies (e.g. Google Analytics) to perform analytics. Optional cookies also allow us to store information about the user's activity on the browser. Such cookies may also be used for, among other things, targeted marketing.
- 5.4. The cookies used on the website are further divided into two sub-categories which determine the time the cookies are used on your device:
- temporary, i.e. session cookies are used only for a single session and are stored on your device until the device or browser is closed; and
 - permanent cookies that are stored on your device even after you stop browsing until they expire or are deleted.
- 5.5. If you wish to remove or block the above cookies, please update your browser settings. Please note that rejecting cookies may affect your experience on our website.

6. Disclosure and transfer of personal data

- 6.1. In connection with the processing activities that we carry out, we may transfer and disclose your personal data to third parties for the purposes set out in section 3 of this personal data processing notice, if it is permitted and in accordance with applicable law. Among others, we transfer your personal data (including health data) in the following cases and ways:
- national information systems and registers (e.g. Health Information System, Patient Safety Database, Digital Prescription Centre);
 - our business partners that we use to better manage our business (e.g. IT service providers, but also accounting, courier and payment service providers) or to provide, improve and monitor the quality of the healthcare and other related services we provide (e.g. external providers of laboratory tests, genetic tests and medical image processing, other research institutions and organisations). In such cases, we will ensure that all partners and other persons to whom we transfer your personal data will process the personal data strictly in accordance with our instructions and in compliance with the legislation governing the processing of personal data;
 - to public bodies or other public authorities if the transfer of personal data is necessary for us to comply with our legal obligations or to prevent or investigate possible criminal offences;

- to other third parties (e.g. legal advisers) if it is necessary to protect our assets and the rights of third parties or to defend against legal claims.
- 6.2. Your personal data will not generally be transferred outside the European Economic Area. If we do so, we will implement appropriate safeguards to ensure that such transfers are in accordance with the applicable legislation and are secure. With regard to transfers of personal data to countries that do not offer an adequate level of data protection, we use appropriate safeguards when transferring personal data, for example by using the European Commission's standard contractual clauses in personal data transfer agreements. You can find out about the applicable safeguards by contacting us by using the contact details set out in this personal data processing notice.

7. Security of personal data

We will implement appropriate technical and organisational measures to safeguard your personal data, giving much attention to the risks arising from the processing of personal data, in particular accidental or unlawful destruction, loss, alteration and unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed. However, please note that while we strive to ensure the security of personal data, no safeguards can completely eliminate all possible security risks.

8. Retention of personal data

- 8.1. We only process and store your personal data for as long as necessary to achieve the purposes described in section 3 of this personal data processing notice or as required by applicable legislation. In determining the retention periods for personal data, we will be guided by, among other things, the legislation and rules governing the following areas, for example:
- the rules governing the conditions and procedures for documenting the provision of health services (including requirements concerning patient safety cases);
 - the requirements for the storage of logs in health care provider's information systems;
 - the requirements of accounting and tax legislation.
- 8.2. When the obligation or necessity to retain personal data has expired, we will delete the relevant personal data or anonymise it in accordance with the requirements of applicable legislation.

9. Your rights as a data subject

- 9.1. Under the applicable legislation, you as a data subject have the following rights in relation to the processing of your personal data:
- the right to request access to your personal data, including a copy of the personal data being processed;
 - the right to request the updating and correction of your personal data. Please note that in doing so, we may need to verify the accuracy of the information you provide;
 - the right to request the deletion of your personal data. Please note that, for legal reasons, we may not always be obliged to comply with your request (for example, if the personal data is still necessary to prepare, submit or defend a claim). In this case, we will inform you thereof in our reply to your request;
 - the right to request restriction of the processing of your personal data;
 - the right to request the transfer of your personal data;
 - the right to object to the processing of your personal data;
 - if the processing is based on your consent, the right to withdraw your consent at any time. Please note that the withdrawal of consent does not affect the lawfulness of the processing of personal data that took place before the withdrawal.
- 9.2. You can exercise your rights in accordance with the requirements of the applicable legislation. These rights may be limited by law, depending on the specific circumstances and processing operations. To exercise your rights, please contact us by email at andmekaitse@ultraheli.ee.

- 9.3. In exercising our rights to process your personal data or in exchanging relevant information, we may need to ask you for certain information or documents to identify you. This is necessary, among other things, to ensure that personal data is not disclosed to any person who is not you or who does not have a right to receive your personal data.
- 9.4. If you believe that your data protection rights have been infringed, you also have the right to lodge a complaint with the Data Protection Inspectorate using the contact details below:

Tatari 39
10134 Tallinn
Republic of Estonia
E-mail address: info@aki.ee
Phone: +372 627 4135

10. Changes to this personal data processing notice

We may update this personal data processing notice, as may be necessary. In the event of material changes, we will notify you by email or any other contact details you have made available to us. This notice was last updated on the "Last Updated" date above.

SPECIAL RULES ON THE PROCESSING OF PERSONAL DATA OF JOB APPLICANTS

1. General

- 1.1. This subsection of the personal data processing notice explains the processing of your personal data when you apply for a job with us, including by responding to our job advertisements, or when we contact you on our own initiative to establish an employment relationship.
- 1.2. The parts not covered by this subsection (e.g. information about your rights as a data subject) are covered in the general section of the personal data processing notice.

2. Collection and processing of personal data

- 2.1. In particular, we collect and process personal data that you have provided to us during the application and recruitment process. To the extent permitted by applicable law, we may also collect your personal data from third parties, including from public databases or recruitment portals, as well as from referrers, to the extent reasonably permitted by applicable law.

3. Purposes of and legal basis for the processing of personal data

- 3.1. **In connection with the data processing activities related to the application for employment**, we process personal data of data subjects, where relevant, for the following purposes and on the following legal grounds:
- the collection of applications, including own-initiative contacts with candidates for the purpose of establishing an employment relationship: pre-contractual measures taken in accordance with the applicant's request (Article 6(1)(b) of the GDPR) or our legitimate interest in contacting the candidate for the purpose of establishing an employment relationship (Article 6(1)(f) of the GDPR);
 - conducting a job interview and general assessment of the candidate's suitability, including contacting them to ask for further information (and, in the case of a successful candidate, taking the necessary steps to conclude the contract): taking pre-contractual steps in accordance with the candidate's request (Article 6(1)(b) of the GDPR) and/or our legitimate interest in assessing the suitability of the candidate, including to verify the information provided by you and to process information from the indicated referees (where applicable) (Article 6(1)(f) of the GDPR);
 - conducting limited background checks: our legitimate interest in assessing the suitability of the candidate (Article 6(1)(f) of the GDPR);

- retaining your application for more than one year (from the end of the application process) for the purpose of contacting you in the future about vacancies or job offers (consent in accordance with Article 6(1)(a) of the GDPR);
- managing potential legal claims: our legitimate interest in preparing, bringing and defending legal claims (Article 6(1)(f) of the GDPR).

4. Categories of personal data

4.1. In particular, we process the following personal data for the purposes listed in section 3 of this subsection:

- general personal data, including your name, home address, contact details;
- information contained in your application and curriculum vitae (CV), such as your level of education and information about educational institutions, language skills, details of your previous jobs and experience (including previous employers, periods of employment, qualifications and professional certificates), information about the potential position, salary and other benefits, language skills;
- other data collected during the recruitment process, e.g. the status of the recruitment process, the exchange of information related to the recruitment process, information on recommendations and referrers (including information on the referrer), data and findings identified during background checks, information on the outcome of the recruitment process and the reasons for it;
- any other personal data necessary for the award of the contract to the successful candidate.

4.2. We may also collect other personal information that you voluntarily provide to us during and after the recruitment process.

5. Disclosure and transfer of personal data

5.1. We may transfer and disclose your personal data to third parties for the purposes set out in point 3 of this subsection in connection with the processing activities we carry out, in cases this is permitted and in accordance with applicable law. Among other things, we transfer your personal data in the following cases and ways:

- via our partners that we use to better organise our activities (in particular IT service providers, but also recruitment agencies and other recruitment service providers);
- to other third parties (e.g. legal advisers) if necessary to protect your assets and rights or defend against legal claims.

6. Retention of personal data

6.1. We will process and store your personal data only for as long as necessary to achieve the purposes described in section 3 of this subsection or as required by applicable law. If your candidacy is unsuccessful, we will keep your data for up to 1 year after the end of the application process, in particular for the purpose of preparing, filing and defending in any legal claims arising from the recruitment process. In some cases, we may retain personal data for a longer period of time if the retention of personal data is necessary to protect our or third parties' legitimate interests, for example in the case of a pending litigation. If you have consented to the processing of your personal data, we will retain your personal data in accordance with the conditions set out in the consent form.

6.2. In the event that we enter into a contract with you as a result of your application, further processing of personal data, including retention, will be subject to an employee privacy notice, which will be made available to you at the latest at the time of the contract.

6.3. When the obligation or necessity to retain personal data has expired, we will delete the relevant personal data or anonymise it in accordance with the requirements of applicable legislation.