

Privacy Policy

This privacy policy governs the processing of personal data at the MIT Group.

I. Definitions:

- 1) **MIT Group** – entities that are part of the Medical Investment Trust group, related in person or by equity, having common procedures for the protection of personal data, i.e.:
 - a) Medical Investment Trust Spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw, ul. Jana Nowaka-Jeziorańskiego 6/83, 03-984 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register under the KRS number: 0000566103, NIP (tax ID number): 1132892562, with share capital amounting to: PLN 222,000,000.00,
 - b) Reverhotels Spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw, ul. Jana Nowaka-Jeziorańskiego 6/82, 03-984 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register under the KRS number: 0000678304, NIP (tax ID number): 1132942254, with share capital amounting to: PLN 5.000,00,
 - c) Hosmed Spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw, ul. Jana Nowaka-Jeziorańskiego 6/82, 03-984 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register under the KRS number: 0000543403, NIP (tax ID number): 1132885131, with share capital amounting to: PLN 505.000,00,
 - d) Magodent Nieruchomości Spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw, ul. Jana Nowaka-Jeziorańskiego 6/84, 03-984 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register under the KRS number: 0000428698, NIP (tax ID number): 1132857821, with share capital amounting to PLN 120,000.00,
- 2) **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation),
- 3) **Joint Controllers** – entities forming part of the MIT group, which are joint controllers within the meaning of Article 26(1) of the GDPR, and which, on [...] entered into a contract for the joint controllership of personal data,
- 4) **Personal data** – any information about an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, identification number, location data, internet identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of a natural person,
- 5) **Processing** – an operation or set of operations performed upon Personal Data or sets of Personal Data in an automated or non-automated manner, such as collection, recording, arranging, organizing, storing, adapting or modifying, downloading, viewing, using, disclosing by transmission, disseminating or otherwise making available, matching or combining, limiting, erasing or destroying,

- 6) **Controller** – an entity which, alone or jointly with others, determines the purposes and methods of personal data processing,
- 7) **Policy** – this Privacy Policy.

II. **Personal data controller:**

Your personal data is processed by the following MIT Group entities, which are joint controllers within the meaning of Article 26(1) of the GDPR, pursuant to the joint controllership agreement concluded on 1st of August 2023 year:

1. Medical Investment Trust Spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw, ul. Jana Nowaka-Jeziorańskiego 6/83, 03-984 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register under the KRS number: 0000566103, NIP (tax ID number): 1132892562, with share capital amounting to: PLN 222,000,000.00 – **Data Controller 1**,
2. Reverhotels Spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw, ul. Jana Nowaka-Jeziorańskiego 6/82, 03-984 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register under the KRS number: 0000678304, NIP (tax ID number): 1132942254, with share capital amounting to: PLN 5.000,00 – **Data Controller 2**,
3. Hosmed Spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw, ul. Jana Nowaka-Jeziorańskiego 6/82, 03-984 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register under the KRS number: 0000543403, NIP (tax ID number): 1132885131, with share capital amounting to: PLN 505.000,00 – **Data Controller 3**,
4. Magodent Nieruchomości Spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw, ul. Jana Nowaka-Jeziorańskiego 6/84, 03-984 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register under the KRS number: 0000428698, NIP (tax ID number): 1132857821, with share capital amounting to PLN 120,000.00 – **Data Controller 4**,

III. **Joint controllership:**

1. The entities within the MIT Group work collaboratively on an ongoing basis to ensure the provision of the best and highest-quality services to their clients. Therefore, they jointly establish the objectives and methods of personal data processing. They also employ shared tools for personal data processing and engage in joint marketing and sales activities. Accordingly, the MIT Group entities, in accordance with their obligations as stipulated in Article 26(1) of the GDPR, have chosen to enter into a joint controllership agreement on 1st of August 2023 year.
2. In compliance with the requirement set forth in Article 26(2) of the GDPR, the Joint Controllers will make the details of the arrangements they have concluded for the joint controllership of your personal data available. This will encompass their respective

responsibilities regarding GDPR obligations, particularly in relation to your rights. Additionally, it will outline the obligations of the Joint Controllers regarding the fulfilment of the information requirement on the website: **Joint Controllers**.

3. Each of the Joint Controllers is committed to fulfilling their respective information obligations to you in accordance with the laws concerning personal data protection.
4. You retain the right to exercise any rights arising from provisions related to personal data protection with respect to each of the Joint Controllers.
5. Data Controller 1 assumes the responsibility of furnishing you with the details of the arrangements pertaining to the joint controllership of your personal data, as well as information regarding your rights in connection with the processing of your personal data.

IV. Contact point

In order to facilitate your contact with entities processing personal data, and for the purposes of submitting requests and exercising your rights, the Joint Controllers have created a joint contact point, i.e.:

e-mail: biuro@e-sadowski.pl, phone number: 731 50 571.

V. Purposes of personal data processing:

1. The MIT Group engages in the processing of personal data for various purposes. Consequently, the grounds for processing personal data vary based on the specific purpose of the processing.
2. Personal data is processed, notably, for the following purposes:
 - a) fulfilling contractual obligations,
 - b) meeting obligations arising from legal provisions,
 - c) executing all requisite actions essential for the smooth operation of the entities forming the MIT Group. These actions encompass activities like receiving and dispatching correspondence, generating and sending VAT invoices, conducting analyses and statistical assessments, pursuing, establishing, and safeguarding legal claims.
 - d) providing services through electronic means,
 - e) establishing communication for marketing purposes,
 - f) establishing communication for commercial purposes,
 - g) promoting activities conducted by the MIT Group entities,
 - h) distributing newsletters,
 - i) ensuring the appropriate utilisation of the websites belonging to the entities constituting the MIT Group.

VI. Legal basis for personal data processing:

1. Your personal data is processed on the grounds of:
 - a) Article 6(1)(a) of the GDPR – your voluntary consent for the processing of personal data, specifically for the purposes of sending commercial and marketing information,
 - b) Article 6(1)(b) of the GDPR – processing of personal data is essential for the performance of the contract you are a party to or for the fulfilling of your requests made prior to the conclusion of the contract.

- c) Article 6(1)(c) of the GDPR – processing of personal data is necessary for compliance with legal obligations imposed on the Joint Controllers. This includes obligations arising from legal provisions and final decisions.
 - d) Article 6(1)(f) of the GDPR – processing of personal data is necessary for legitimate interests pursued by the data controller. This encompasses statistical analysis, addressing complaints, petitions, and requests, as well as the establishment, exercise, and defence of legal claims. Moreover, it includes the provision of information in response to inquiries made through contact forms.
2. The provision of personal data is voluntary; however, not supplying data as required by the Controller may result in the denial of service/contract due to the inability to deliver services, provide information, or execute other activities that necessitate the processing of personal data.

VII. Type of data and manner of personal data processing

1. The processing of personal data by the Joint Controllers will include, in particular, the following types of personal data:
- a) full name,
 - b) PESEL number
 - c) ID card number and series,
 - d) correspondence address,
 - e) sex,
 - f) age,
 - g) contact details, including telephone number and e-mail address,
 - h) company data, including NIP (tax ID) number,
 - i) bank account number,
 - j) information indicated in concluded agreements, contracts, arrangements and settlements.
2. Data is processed electronically, e.g. in IT systems used by the Joint Controllers, and in paper form.
3. The processing of personal data will refer to the following categories of persons:
- a) clients of the Parties,
 - b) persons interested in using the services of the Parties,
 - c) employees of the Parties,
 - d) service providers,
 - e) contractors,
 - f) recipients of marketing information,
 - g) recipients of commercial information.

VIII. Rights of data subjects

1. You have the following rights at all times:
- a) the right to access your data and to obtain a copy thereof;
 - b) the right to rectify (correct) your personal data;
 - c) the right to have your data erased;
 - d) the right to restrict the processing of data – any individual whose data is being processed can request the restriction of personal data processing by each of the Joint Controllers. This entails limiting processing to only those activities agreed upon with you.
 - e) the right to object to the processing of personal data;

- f) the right to data portability;
 - g) the right to lodge a complaint with a supervisory authority, such as the President of Personal Data Protection Office;
 - h) The right to withdraw consent for personal data processing. Note that the withdrawal of consent does not affect the legality of data processing conducted prior to the withdrawal. Each of the Joint Controllers retains the right to process personal data even after consent withdrawal if such processing is necessary for:
 - complying with a legal obligation as required by the law of the EU or Member State the joint controller is subject to, or performing a task in the public interest or in the exercise of official authority vested in the joint controller.
 - archiving purposes in the public interest, scientific or historical research, or statistical purposes, as stipulated in Article 89(1) of the GDPR. This applies when withdrawing consent is likely to impede the achievement of the designated objectives of such processing.
 - establishing, pursuing or defending claims;
 - purposes arising from legitimate interests pursued by any of the Joint Controllers or a third party. This applies when data processing, regardless of consent, is grounded in Article 6(1)(c), (d), (f) of the GDPR.
2. In order to exercise your rights, please contact us via the contact point specified in section IV hereof.

IX. Recipients of personal data:

1. Your personal data will be processed by employees and individuals providing services to entities within the MIT group.
2. Entities in the MIT group provide access to your personal data solely to individuals and entities equipped with appropriate training in personal data processing security.
3. Entities within the MIT Group may delegate the processing of personal data to external entities, such as IT system providers, accounting firms, and marketing service providers. This delegation occurs exclusively through written agreements for personal data processing.
4. Recipients of your personal data include entities authorized to access personal data based on applicable legal provisions and relevant legal justifications.
5. Your personal data will not be transferred outside the European Union/European Economic Area.

X. Profiling and automated decision-making

1. The Joint Controllers shall not make decisions by automated means.
2. Moreover, your personal data will not undergo profiling.

XI. Retention period for personal data:

The duration for which personal data is retained depends on the nature of the service rendered to you, the purposes of processing, and the legal bases. Essentially, your personal data is stored for the duration required to fulfil legal obligations imposed on each of the Joint Controllers, extending until the termination of agreements and the subsequent expiration of agreement-defined periods. This also encompasses periods essential for establishing, pursuing, and defending claims. In instances of personal data processing based on your consent, data will be processed until consent withdrawal or objection. Once the processing periods have expired, personal data is purged.

XII. Personal data security

1. Each Joint Controller adheres to the regulations pertaining to personal data protection and ensures an appropriate level of personal data security. This is achieved through the application of relevant organizational and technical measures, the execution of risk analyses, participation in training related to personal data processing and protection, and the regular update of measures and procedures.
2. Access to personal data is granted by the Joint Controllers exclusively through written authorization to individuals with proper training in personal data protection. Additionally, the Joint Controllers only entrust personal data processing to external entities based on written processing delegation agreements. These agreements outline the responsibilities and obligations of the processors.
3. Every entity within the MIT Group and individuals involved in personal data processing, either through personal authorization or delegation agreements, are bound to uphold the confidentiality and integrity of the provided data.

XIII. Marketing

1. Commercial information, newsletters, and other marketing and advertising content will only be transmitted to you based on your prior voluntary consent to a specific marketing channel.
2. Marketing initiatives, grounded in your consent, can be executed by each of the Joint Controllers through electronic mediums (such as email and newsletters), phone communication, text messages, or conventional mail.
3. Your marketing consent may be withdrawn at any time by submitting such a request via the contact point referred to in point IV.

XIV. Contact form:

1. In cases involving the handling of your inquiries submitted through the website's contact form, the entities detailed in section II hereof are the data controllers.
2. Personal data furnished through the contact form are processed to address the inquiries, provide the requested information, and present offer particulars.
3. The legal foundation for processing personal data provided through the contact form is Article 6(1)(f) of the GDPR, signifying the legitimate interests of the Joint Controllers.
4. Recipients of your personal data will exclusively include the entities identified in section IX hereof.
5. Processing of your personal data will occur within the period outlined in section X hereof, which varies based on the nature of the case.
6. Concerning the processing of personal data via the contact form, your rights as described in section VIII hereof are applicable.
7. The provision of your personal data is voluntary yet obligatory for the purpose of processing and responding to the inquiry.

XV. Changes to the privacy policy

The Joint Controllers revise the provisions hereof depending on the change of the physical and legal status. Any revisions to this Policy shall be published on the website without undue delay. To ensure transparency regarding the implemented changes, the Joint Controllers will specify the date of the most recent document update.