

CONFIDO'S PRIVACY NOTICE

In force as of 03 April 2023

Confido's Privacy Notice sets out the terms and conditions of the processing of personal data which are followed by all Service Providers belonging to the Confido Group and other Service Providers providing Services to Customers on behalf of Confido.

Depending on the Service selected by the Customer, Confido may determine specific terms and conditions for the processing of personal data.

Confido has the right to unilaterally supplement and/or amend this Privacy Notice from time to time. In this case, Confido notifies Customers of the implemented changes.

1. TERMS

1.1. This Privacy Notice uses the following terms:

Privacy Notice	This Privacy Notice regulates the processing of the Customer's personal data by Confido.
Confido	Companies belonging to the Confido Group, including AS Arstikeskus Confido and all other persons acting under Confido's trademark and on behalf of Confido, including Nordic Imaging OÜ and Medco Partners Osaühing.
Confido Self-Service	A digital booking environment through which the Customer and Confido conclude service contracts and manage bookings.
Remote Service	A telemedicine service used online (webchat or video call) or by phone for the provision of Services.
Home Visit Service	A service provided by Confido to a Customer at the Customer's residence.

Customer	A person to whom Confido provides Services or who has expressed their wish to receive Services from Confido.
Advice Line	An advisory service provided via the phone number 1500 for a fee.
Service	Healthcare Services or Health Services provided by Confido to Customers irrespective of whether they are provided during a visit or as a Remote Service.
Health Service	A Service provided to the Customer that is not a Healthcare Service.
Healthcare Service	A Service provided by a registered healthcare professional and a person holding an activity license for the provision of the relevant Service, if the existence of such a registration or activity license is required for the provision of the relevant Service, following the rules of medical science. A Healthcare Service is the activity of a Healthcare Service Provider for the prevention, diagnosis and treatment of an illness with the aim of maintaining Customers' good health and raising their quality of life (including medical examinations, analyses and the provision of medical certificates, etc.). The Healthcare Services provided by Confido are listed on Confido's website https://www.confido.ee/ and the list may change over time.
Service Provider	A company operating under the Confido trademark, an employee or other representative of Confido or a legal or natural partner of Confido who is used in the provision of the Service and/or who is a provider of Health Service or Healthcare Service.
Standard Terms and Conditions	Confido's standard terms and conditions for Service provision, which are available at https://www.confido.ee/confido-tingimused/ .

Appointment	A meeting between Confido's representative and a Customer on Confido's premises or via a Remote Service for the purpose of providing Services.
GDPR	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 regarding the protection of natural persons with regard to the processing of personal data and of the free movement of such data and the repeal of directive 95/46/EC.

2. ROLE OF CONFIDO IN THE PROCESSING OF PERSONAL DATA

- 2.1. Confido can be regarded as the controller of Customers' personal data within the meaning of the GDPR. As the Service Provider, Confido determines which personal data must be collected from the Customer in order to provide high-quality Services and, inter alia, determines the objectives and tools of the collection and processing of personal data.
- 2.2. In certain cases, Confido may include other controllers in the processing of Customers' personal data who may be regarded as independent controllers or processors authorised by Confido. A more detailed overview of such third parties is provided in clause 6 of the Privacy Notice.
- 2.3. If it is required to process the Customer's health data in order to book the Healthcare Service, the Healthcare Service Provider will inform Confido of the need to collect such data, and in that case, Confido will process the Customer's health data based on the Healthcare Service Provider's authorisation and in accordance with the instructions provided by the Healthcare Service Provider.

3. PERSONAL DATA COLLECTED, THE PURPOSE AND THE LEGAL BASIS OF THEIR PROCESSING

- 3.1. Confido processes the following personal data of the Customer, only for specified purposes based on applicable law:

Personal data category	Personal data	Objective	Legal basis
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Identification data	Given name and surname, personal identification code, residency, document number (ID card, passport, driver's licence), language of communication.	To book and provide Services to the Customer.	1. If the Customer contacts Confido in order to be provided Healthcare Services, Confido processes personal data in accordance with sections 4 ¹ (1), 4 ¹ (1 ¹) and 4 ¹ (1 ²) of the Health Services Organisation Act and Confido's Standard Terms and Conditions for Services.
Contact details	Telephone number, address, e-mail address, details regarding the home visit that will be conducted (including address).	To book and provide Services to the Customer. To contact the Customer, including transmission of additional guidelines and instructions related to the Service before and after providing the Service; for example, Confido may send a reminder about their appointment to the Customer. To send newsletters and other marketing and promotional content that may be of interest to the Customer.	2. If the Customer turns to Confido in order to be provided Healthcare Services upon the referral of their employer or another person in relation to occupational health or to obtain a necessary medical certificate, Confido processes data for the performance of the contract entered into between Confido and the Customer's employer and in accordance with sections 4 ¹ (1), 4 ¹ (1 ¹)
Booking details	Data on the Service Provider, time of Service provision, place	To enable the Customer to book a	

	of Service provision and the content of the Service.	Service with the Service Provider.	and 4 ¹ (1 ²) of the Health Services Organisation Act and Confido's Standard Terms and Conditions for Services.
Health insurance information	Information concerning the existence of health insurance, referrals and general medical history.	To book and provide Services to the Customer, including transmission of additional guidelines and instructions related to the Service before and after providing the Service.	3. If the Customer turns to Confido in order to be provided Services other than Healthcare Services (e.g. nutrition consultancy, physiotherapy), we process the Customer's personal data on the basis of their consent.
Data concerning health	Data on the Customer's state of health, including information regarding the doctor the Customer has visited or wants to visit, the Services provided to the Customer and the data collected from them in the course of the provision of such Services, medicines taken by the Customer, X-ray images and/or other clinical images made for the provision of Services. If the provision of the Healthcare Service requires a referral	To plan the provision of Services, including to prevent, diagnose and treat illnesses, injuries or poisoning in order to alleviate a person's complaints, prevent deterioration of their health or aggravation of the disease and restore their health. To document Services.	4. Receiving newsletters and other regular direct marketing as well as other types of marketing and promotional content may be interesting to the Customer, based on the Customer's specific consent or based on Confido's legitimate interest, provided that Confido has taken into

	letter, information on the referral letter. In addition, the instructions and guidelines given to the Customer by Confido. The composition and scope of health data that Confido processes in a specific case depends largely on the Service selected by the Customer.		consideration the Customer's interests and fundamental rights and freedoms, the Customer's reasonable expectations that are based on their relationship with Confido and other circumstances relevant to providing direct marketing.
Payment information	Information on payment for the Service, including data of the person paying for the Service.	To settle the expenses of Services.	
Complaints and suggestions	Data related to the complaints or suggestions submitted by the Customer or their parent or guardian, including the booking number and the Service in connection with which the suggestion or complaint has been submitted or the name of the employee in connection with whose	To ensure the quality of Service.	Legal obligation and on the basis of Confido's legitimate interest, which refers to ensuring the best possible quality of Services for Customers.

	activities the complaint has been filed.		
Recording of Remote Service	Recording of the Customer contacting Confido (recording of the call and video, messages in chat) via a Remote Service platform, including platforms provided by third parties where Confido provides Services.	To monitor the quality of Healthcare Services.	Standard Terms and Conditions
Call recording	The Customer's call to Confido, which may include data identifying the caller, such as their name and personal identification code, information required for providing Healthcare Services, including data concerning health, the caller's contact details and other information provided by the Customer during the call.	To monitor the quality of Healthcare Services.	
Video recording	The Customer's image, appearance and	To ensure the safety of property, including	On the basis of Confido's legitimate

	behaviour in the field of vision of cameras at a specific time.	equipment and other property belonging to Confido and property of the Customer. To identify offences and violations committed on the premises.	interest. A large number of Customers visit Confido's business premises every day. Cameras help to ensure the safety of the property of Confido and its Customers if Customers' property is left unattended in the customer area on Confido's premises.
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- 3.2. Confido processes personal data received directly from the Customer and from third party sources. Such third party sources include the Customer's legal representative, the Health Insurance Fund, the Patient Portal information system, the prescription centre, the image bank or any other health-related IT environment.
- 3.3. Disclosing personal data to Confido is optional, but if the Customer decides not to disclose the data, the customer cannot then book or use services offered by and through Confido.

4. AUTOMED DECISION OR PROFILING

- 4.1. Confido may process Customers' personal data for automated decision-making as well as use automated processing of personal data in order to process Customer's personal data, which includes profiling and data modelling, so that we can provide services specific to Customers' preferences, set prices for services, detect fraud and the risk of fraud or fulfil marketing objectives. The Customer has the right to express their opinion to Confido and to dispute automated decisions by sending an e-mail to andmekaitse@confido.ee, which is referred to in clause [9.3.](#) of this Privacy Notice.

5. STORAGE OF PERSONAL DATA

- 5.1. Confido does not store personal data longer than it is necessary for the purposes of processing personal data or pursuant to applicable law.

5.2. Pursuant to the Health Services Organisation Act Confido stores:

- 5.2.1. data proving provision of outpatient and inpatient medical care, as a rule for 30 years starting from the date of confirming the data of the Healthcare Service provided to the Customer;
- 5.2.2. when ordering medical examinations, we store the results together with the Customer's health card and the corresponding tissue samples for at least 30 years;
- 5.2.3. the information system logs of Confido as a Healthcare Service Provider are stored for five years;
- 5.2.4. feedback collected in order to assess Customer satisfaction is stored for five years from the moment of receiving the feedback.
- 5.2.5. health check records and medical examination results for 30 years starting from the moment the decision concerning the health check is made.

5.3. Pursuant to the Accounting Act, we store accounting documents for seven years.

5.4. As a general rule, Confido stores the data collected for entry into a contract with the Customer, the longer retention period of which has not been prescribed by applicable law, for as long as they are required for the purposes of the contract during the term of the contract or up to five years after expiry of the contract.

6. TRANSMISSION OF PERSONAL DATA

6.1. Confido does not transmit Customers' personal data to third parties unless Confido has a right to do that pursuant to the law or the transmission of personal data to third parties is required for the provision of Services.

6.2. For the purposes of convenient and high-quality Service provision, Confido has engaged various cooperation partners who have the right to process Customers' personal data to a limited extent on the basis of Confido's authorisation. Such cooperation partners are, above all, various cooperation partners providing healthcare services (e.g. providers of general or specialist medical services whom Confido engages in the provision of Services to Customers), IT partners (various providers of server services, IT support services, communications services and other IT services), marketing partners, providers of security services, cooperation partners whom Confido engages in the assessment of health indicators, providers of payment services and other service providers or cooperation partners.

- 6.3. For the provision of Remote Services, Confido may also use third party cooperation partners who provide an online platform required for the provision of telemedicine services. Such a telemedicine platform may be branded as a Confido platform or a third party platform. Despite the fact that the platform may be branded as a third party platform, Confido remains the controller of the Customer's personal data.
- 6.4. In addition, the Confido company providing the Service may transmit the Customer's personal data to other companies belonging to the Confido Group if it is required for providing Services to the Customer.
- 6.5. When providing Healthcare Services to Customers, Confido transmits health information to the e-health Patient Portal information system located at <https://id.digilugu.ee/> under the current law, the data controller of which is the Health and Welfare Information Systems Centre (registry code 70009770, address Pärnu mnt 132, 11317 Tallinn). For questions related to the Patient Portal, Customers can contact the customer service of the Health and Welfare Information Systems Centre at +372 794 3943 or by e-mail at abi@tehik.ee.
- 6.6. In order to provide Customers with Services, Confido may, as appropriate, under the current law, transmit and/or receive Customers' health data through a prescription centre, the controller of which is the Health and Welfare Information Systems Centre (registry code 70009770, address Pärnu mnt 132, 11317 Tallinn), if it is necessary for providing Customers with Services. For questions related to the prescription centre, you can contact the user support of the Health and Welfare Information Systems Centre by calling +372 794 3943 or e-mailing abi@tehik.ee.
- 6.7. In order to provide Customers with Services, Confido may, as appropriate, under the current law, transmit and/or receive Customers' health data through an image bank, the controller of which is the Image Bank Foundation (registry code 90007945, address Puusepa 8, 51014 Tartu, Estonia), if it is necessary for providing Customers with Services. For questions related to the image bank, you can contact their customer service at +372 5331 8888 or by e-mail at abi@pildipank.ee.
- 6.8. When providing Services related to the issue of a motor vehicle driver's medical certificate to Customers, we may transmit their health data (medical certificate) to the Transport Administration digital environment, the controller of which is the Transport Administration (registry code 70001490, address Valge 4, 11413 Tallinn). For questions related to data processing by the Transport Administration, please contact them at +372 620 1200 or by e-mail at info@transpordiamet.ee.
- 6.9. We may transmit Customers' medical data to the Health Insurance Fund (registry code

74000091, address Lastekodu 48, 10113 Tallinn) when providing them with Services, the treatment invoice of which shall be paid wholly or partly by the Health Insurance Fund from the health care funds. For questions related to the Health Insurance Fund, you can contact them at +372 669 6630 or by e-mail at info@tervisekassa.ee.

- 6.10. Pursuant to current law, Confido may be obliged to disclose personal data to courts or law enforcement authorities on the basis of a regulation issued by the respective body in accordance with current legislation, or when transmitting of personal data is mandatory on the basis of the Insurance Activities Act in relation to an enquiry submitted by the insurer. In all such cases, Confido transmits personal data only if it is mandatory pursuant to current legislation and following all principles applicable to the processing of personal data, including the principle of minimalism.

7. SECURITY OF PERSONAL DATA

- 7.1. Confido has taken necessary organisational, physical and IT-related security measures to protect Customers' personal data from any misuse, unauthorised access, disclosure, modification or destruction, even if the data is transmitted to a foreign country. If Customers wish to obtain a copy of the security measures taken with regard to the transmission of personal data to foreign countries, they must submit a relevant request to Confido.
- 7.2. Only authorised persons have access to Customers' personal data. Persons with access to personal data are obligated to comply with the confidentiality obligation.

8. VIDEO RECORDINGS

- 8.1. Confido has installed video cameras that allow for video recording on its business premises. When installing the cameras, Confido has strictly adhered to the purpose of their installation and prevented the undue infringement of the rights of the persons in the field of view of cameras. An image of the Customer may be recorded by cameras when they visit Confido. Confido confirms that none of the cameras are installed in such a manner that their field of vision includes an area where Customers have a heightened expectation of privacy (toilets, doctor's offices). Areas within the field of vision of cameras are marked using relevant stickers.
- 8.2. Confido confirms that none of the cameras installed on its business premises record sounds. Using cameras installed on its premises, Confido collects and processes only the image of persons within the field of vision of the cameras, recording their appearance and behaviour.

- 8.3. Cameras are installed in such a manner that their field of vision includes:
 - 8.3.1. the reception desk and the customer waiting areas on Confido's premises;
 - 8.3.2. five wards (S04-S09) in the addiction treatment department on the sixth floor at Veerenni 51.
- 8.4. Confido uses cameras that are installed permanently and with the possibility of magnification. The cameras allow for monitoring in real time or at a later time. Confido carries out monitoring by means of cameras 24/7.
- 8.5. Confido stores and processes video recordings for one (1) month with the purpose of clarifying and proving circumstances for which video recordings are made (e.g. to provide proof concerning a security incident that occurred within the field of vision of a camera to the body that initiated proceedings). The video recordings will be automatically deleted after the expiry of the term. On reasonable grounds (e.g. upon the occurrence of a security incident or in the investigation of a work-related accident), Confido has the right to store video recordings longer than a month, i.e. until such grounds cease to exist.
- 8.6. Confido stores the recordings of video cameras in a non-personal form on a server disk with limited access that can be accessed only by certain employees (above all by the administrative specialist). These persons may provide other employees of Confido with access to such video recordings to the extent required for fulfilling the objectives stated in this Privacy Notice.
- 8.7. Confido has taken the necessary organisational, physical and IT- related security measures to protect video recordings and the personal data processed using them from any misuse, unauthorised access, disclosure, modification or destruction. Confido has notified all the persons authorised to view video recordings that such recordings may be viewed only for the purposes and to the extent provided for in this Privacy Notice.
- 8.8. Confido has the right to transfer recordings to the following persons:
 - 8.8.1. public authorities to whom Confido must provide video recordings and/or personal data collected through them according to relevant legislation;
 - 8.8.2. legal advisors who provide legal services to Confido in connection with violations identified using video recordings;
 - 8.8.3. camera maintenance service providers, i.e. IT service providers to the extent necessary to identify whether the camera is functioning and to eliminate any errors;
 - 8.8.4. the Labour Inspectorate and/or court, where necessary.

9. RIGHTS RELATING TO PERSONAL DATA

9.1. When processing personal data, the Customer has all the rights of a data subject under applicable legislation, which includes:

Right of access	The Customer has the right to ask whether Confido has any of their personal data and to obtain information about the Customer's personal data that is processed by Confido at any time.
Right to rectification of personal data	The Customer has the right to request that Confido specify or rectify their personal data if they are inadequate, incomplete or incorrect.
Right to object	The Customer has the right to submit objections to the processing of their personal data by Confido if the use of personal data is based on the legitimate interest of Confido.
Right to request erasure of personal data	The Customer has the right to request the erasure of personal data if their personal data is processed with their consent and they have withdrawn their consent.
Right to restrict the processing of personal data	The Customer has the right to request that Confido restrict the processing of their personal data based on current legislation, e.g. if Confido no longer needs the Customer's personal data for the purposes of processing or if the Customer has objected to personal data processing.
Right to withdraw consent given for processing of personal data	If the processing of personal data is based on the Customer's consent, the Customer may withdraw their consent to Confido at any time.
Right to data portability	The Customer has the right to obtain personal data from Confido which they have submitted to Confido and which is processed on the basis of their consent or in order to perform the contract entered into with them,

	in writing or in a commonly used electronic format, and, if it is technically possible, to request that Confido transmit the data to a third party service provider.
Right to file a complaint	The Customer has the right to file a complaint directly to Confido at our e-mail address andmekaitse@confido.ee or to the Data Protection Inspectorate: e-mail address info@aki.ee , telephone +372 627 4135, address Tatari 39, Tallinn 10134.

- 9.2. The Customer's rights related to the processing of personal data listed in this chapter do not include all of their rights. In certain cases, the rights of other data subjects or the legal obligations of Confido may limit the rights of the Customer.
- 9.3. In order to exercise the rights associated with the processing of personal data or to submit applications or questions, contact Confido via our e-mail address andmekaitse@confido.ee.

