

Privacy Statement

Thank you for reading the data privacy statement of Whitelab Service Kft.!

(1) Why is this information important?

In accordance with data protection regulations, we want to provide our customers with detailed information about what personal data we do process, for what purpose, on what legal basis, and for how long during the use of our services. This information has been prepared in compliance with the most important European data protection regulation, the General Data Protection Regulation (GDPR), which is also known as the EU 2016/679 regulation.

(2) Who processes your data?

Data Controller: Whitelab Service Kft. (hereinafter referred to as "Data Controller")

Registered office: 1045 Budapest, Berliu u. 47-49.

Tax number: 12964761-2-41

Representative: Dr. Borbély Kata, Executive Director

Data Protection Officer: Dr. Tamás Barabás, LL.M. Contact: dpo@whitelab.hu

In our work, we cooperate with several companies and professionals to provide high-quality services. As the Data Controller, we choose contractual partners and determine the purpose of data processing, and the tools that can be used by our partners. These service providers are referred to as "data processors" under the GDPR. To ensure the security of the data entrusted to us, we impose strict data processing and data security requirements on our cooperative partners.

(3) What qualifies as personal data?

Any data that can directly or indirectly identify us falls under the definition of personal data. This may include, but is not limited to, information such as a person's name, phone number, GPS coordinates, online identifiers, information relating to physical, physiological, genetic, mental, economic, cultural, or social identity. The more data we provide about ourselves, the more our right to privacy may be compromised.

(4) What activities and services involve the processing of your personal data?

Area of Work related to Data Processing	Purpose of Data Processing	Legal Basis	Duration of Data Processing
1. Conducting laboratory screening tests (e.g., SARS-CoV-2	for the purpose of providing the service to customers ordering	The consent of the data subject (based on GDPR Article 6(1)(a)), as well as GDPR Article 9(2)(h)	For 5 years or until the withdrawal of consent, except for mandatory data processing as

tests) and related data processing	online for rapid and smooth service	for the purpose of providing preventive healthcare services.	required by law, see the operation of the EESZT (Central Health Data System) as described in Article (6).
2. Chemical and sediment testing (urine testing) with home sampling and related data processing	for the purpose of providing the service to customers ordering online for rapid and smooth service	The consent of the data subject (based on GDPR Article 6(1)(a)), as well as GDPR Article 9(2)(h) for the purpose of providing preventive healthcare services.	5 years or until consent is withdrawn
3. Operating user accounts for customers	running a user-friendly service interface for the clients) using multiple laboratory services	The consent of the data subject (GDPR Article 6(1)(a)).	Until consent is withdrawn
4. Sending online newsletters	Sending online newsletters to inform about preventive health examinations, products, and services	The consent of the data subject (GDPR Article 6(1)(a)).	Until consent is withdrawn
5. Service development	Surveying customer satisfaction with various laboratory services, only in the case of active responses to the survey	The legitimate interest of the data controller (GDPR Article 6(1)(f)).	Non-mandatory completion, 1 year after questionnaire evaluation
6. Online payment and related accounting records	Providing convenient online payment conditions for customers	Data processing required for the performance of a contract in which the data subject is a party GDPR Article 6(1)(b)	8 years from recording payment according to Act C of 2000 on Accounting, Section 169(1)
7) Telephone customer service	1. Telephone customer service in cases of appointment	a-b) The legitimate interest of the data controller (based on Article 6 (1) point f) GDPR), with attention	In the case of non-recorded conversations, a written call log, or in the case of recorded audio, a period of 5 years from the first day

	booking via whitelab.hu and 2. Feedback and complaint management	to the Hungarian Civil Code. 2:48 § (1) to the consent for audio recording	of the month following the recording month (for monthly call archiving).
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You may review the detailed table of personal data processed by us [here](#).

(5) Data Processors

A **data processor** is an organization, company, or person who processes personal data on behalf of or at the direction of the Data Controller (Whitelab Service Kft.).

Data Processor	Service
AVIDIN Kft. Registered office: 6726 Szeged Alsó kikötő sor 11/D. Tax number: 12927287-2-06	Laboratory testing, evaluation, and recording in the Electronic Health Service Space (EESZT)
Deákpraxis Kft. Registered office: 6726 Szeged, Gizella u. 47. Tax number: 27485170-2-06)	Laboratory testing, evaluation, and recording in the Electronic Health Service Space (EESZT)
Oracle EMEA Limited East Point Business Park Fairview Dublin 3	Hosting service provider
White Reagens Kft. Registered office: 1045 Budapest, Berliini utca 47-49. Tax number: 24665548-2-41	COVIDIN® software development and operation
DiaWare Számítástechnikai Kft. Registered office: 4032 Debrecen Péchy u. 13. Tax number: 12643510-2-09	Laboratory software operation
Aktiv Digital Media Kft. Registered office: 5600 Békéscsaba, Lencsési út 35-37. 8/46. Tax number: 26629827-2-04	Sending newsletters and managing satisfaction surveys

Patrinus Kft. Registered office: 6000 Kecskemét, Daru utca 11.	Operation of PCR sampling points and administrative execution of subscriptions (data collection)
Csaba Medical Kft. Registered office: 5600 Békéscsaba, Gyulai út 65/1.	Operation of PCR sampling points and administrative execution of subscriptions (data collection)
OTP Mobil Kft. "SimplePay" Registered office: 1143 Bp., Hungária krt.17-9.	Online payment service provider
Amazon Web Services EMEA SARL Registered office: 38 AVENUE JOHN F. KENNEDY, L-1855 Luxembourg	Hosting service provider
Google Ireland Limited/ Google Kft. Ireland, Gordon House, Barrow Street, Dublin 4.	Operator of the server and the questionnaire interface

Important! The transmission of data between the Data Controller and appointed data processors can only be done according to the terms specified in data processing agreements. Personnel authorized to process personal data in the case of data processors are obliged to maintain confidentiality, or they are performing data processing under relevant legal confidentiality obligations.

(6) Transfer of Data to Third Parties

Important! The Data Controller has an obligation to provide data under the Act on Health Data Management and Protection (abbreviated as "Eüak") in the case of data transmission to the **Electronic Health Service Space** (EESZT). The Data Controller is also obliged to report information relevant from a public health perspective to the health administrative authority (as stated in Section 15 of the Eüak). In this case, data transmission is carried out based on legal obligations.

The EESZT data processing information can be found at <https://e-egeszsegugy.gov.hu/GDPR>.

Data transfer to a third country outside the EU/EEA or to an international organization is not carried out. For data protection reasons, the Data Controller primarily cooperates with companies registered in Hungary or the EU/EEA.

(7) Artificial Intelligence

The Data Controller does not use fully automated processing, including profiling, which produces legal effects concerning the data subject or similarly significantly affects the data subject, without human intervention.

(8) What data do we process about you, and what are your rights concerning this?

If you wish, we will provide you with information about the personal data concerning you. You have the right to do this free of charge once a year. The purpose of this request for information (legally known as "data subject request") may not only be to become aware of the data but also to share the processed personal data with you (this is the right of access). You can also request corrections regarding the data processed if, for example, your email address has changed, so that we can stay in touch.

You may also request the deletion or restriction of data processing and object to the processing of personal data, except when processing is based on a legal obligation. If you wish to transfer your personal data processed here to another service provider, we refer to this as the right to data portability, and we also provide this opportunity.

The above provides a brief overview of the exercise of data subject rights. If you would like more detailed information about your rights, please contact our Data Protection Officer (as specified in section 2 of this information).

Important! If you request the deletion of data or withdraw your consent as per the table in section 4 (5th paragraph), please be aware that the exercise of the right to withdraw consent at any time does not affect the lawfulness of data processing based on consent prior to withdrawal. Under legal regulations, we cannot delete mandatory data processing even upon your request. For certain data processing, which also includes personal data, such as card payments, we cannot delete the statements provided for in the Accounting Act or the recording of virus test results in the EESZT system.

(9) Complaints and Regulatory Authority Contact

Please feel free to contact us with any questions about data processing. We will respond to your inquiries within 30 days. If we cannot provide an appropriate response to your request, or if you wish to contact the authority directly, you may do so at the following address:

National Data Protection and Freedom of Information Authority

Registered office: 1055 Budapest, Falk Miksa utca 9-11.

Mailing address: 1363 Budapest, Pf. 9.

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Central email address: ugyfelszolgalat@naih.hu

Website URL: <http://www.naih.hu>

In case of the violation of informational self-determination (data subject) rights, you can also turn to the court. Public information about competent courts can be found [HERE](#).

(10) Accessibility of Services

If, based on this data processing information, you decide not to provide personal data, we will respect your decision. The provision of data is a prerequisite for the services provided by the Data Controller. In the event of non-provision of data, our services will not be available to you. Thank you for your understanding!

(11) This information has been prepared in accordance with the following legal regulations

- General Data Protection Regulation (GDPR) - Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.
- Act XLVII of 1997 on the processing and protection of health and related personal data.

Last updated: September 12, 2023. Valid until amended or withdrawn.