

PRIVACY POLICY

OF MEDICOVER SPORT SP. Z O.O.

Data confidentiality and the protection of our customers' privacy is a priority for us. Consequently, out of concern for the security of your personal data, Medicover Sport Sp. z o.o. has established a policy setting out the rules concerning the manner in which personal data is processed on the helpline, application, websites and webpages belonging to Medicover Sport Sp. z o.o. (hereinafter referred to as **Services**).

We process your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (General Data Protection Regulation, hereinafter **GDPR**).

WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

The controller of personal data within the meaning of Article 4(7) of the GDPR is Medicover Sport sp. z o.o with its registered office in Warsaw (00-807), Al. Jerozolimskie 96, entered in the Commercial Register kept by the District Court for the Capital City of Warsaw under National Court Register (KRS) no. 0000909046 (hereinafter referred to as the **Controller**).

HOW TO CONTACT US

For all matters related to the processing of your personal data, please contact the Controller at the registered office address mentioned above, with the note "Customer Service." You can also reach us by email at bok@medicoversport.pl or by phone at +48 22 290 80 70.

FROM WHICH SOURCES DO WE OBTAIN YOUR DATA?

We typically collect your personal data directly from you, either through dedicated data forms or via cookies. In some cases, we may receive your personal data from an entity that enables you to access our services. When this occurs, it is necessary for us to receive your identification and contact details to properly manage the process in accordance with the service agreement between us and that entity.

WHAT DATA DO WE PROCESS?

The extent of the personal data we will process may vary depending on the service you use. If you contact the Controller using the Service or the contact details provided on the Services, the Controller processes the data for the purpose of contacting you, including your name, email address or telephone number, the content of the question asked or issue raised and possibly other data you provide. In connection with the use of cookies for statistical purposes, the Controller may process the following data: IP address, duration of the respective session, frequency of visits to the Services.

As part of its activities outside the Services, Medicover Sport Sp. z o.o. may also process other personal data concerning you. Below is a link to the page where you will find detailed information on the processing of your data by Medicover Sport Sp. z o.o.: <https://medicoversport.pl/centrum-prywatnosci>.

Information on data processing in the mobile app is available at <https://medicoversport.pl/centrum-prywatnosci> in the "Mobile App Privacy Policy" file.

FOR WHAT PURPOSE AND ON WHAT LEGAL BASIS DO WE PROCESS YOUR DATA WHEN YOU USE OUR WEBSITES?

Data Processing Purpose	Legal Basis
Provision of our services on our Services	Performance of the agreement in accordance with the terms and conditions - Article 6(1)(b) of the GDPR or Voluntarily given consent - Article 6(1)(a) of the GDPR
Management of the Services, ensuring the security of the Services' infrastructure and the services provided, maintaining statistics and improving as well as developing the services provided	Legitimate interest of the Controller - Article 6(1) (f) GDPR.
To provide a response to a person who has made contact with the Controller via the contact form, by telephone, or by post	Legitimate interest of the Controller - Article 6(1)(f) GDPR.
Provide the contacts necessary to service and perform the service agreement entered into with the entity on whose behalf you are entering and to maintain the business relationship	Legitimate interest of the Controller - Article 6(1) (f) GDPR.
Handling of any complaints or claims, as well as the establishment, investigation and defence of claims	Legitimate interest of the Controller - Article 6(1) (f) GDPR.
Carrying out competitions and events, including determining the winner(s), handing over prizes and/or awards, publication of the winner's personal data	Legitimate interest of the Controller - Article 6(1)(f) GDPR.
Fulfilment of legal obligations imposed on the Controller concerning the exercise of data subjects' rights.	Fulfilment of the legal obligation incumbent on Controller - Article 6(1)(c) GDPR.
Email marketing content in the form of a newsletter (containing, in particular, information about the company, new products, current offers/promotions) or marketing content for Medicover Polska products and services (https://www.medicover.pl/uslugi-medicover/medicover-polska/)	Voluntarily given consent - Article 6(1)(a) GDPR.
Performance of direct marketing activities in accordance with your expressed preferences regarding communication channels	Legitimate interest of the Controller - Article 6(1)(f) GDPR.

DO WE PERFORM PROFILING OF YOUR DATA?

Yes, we may perform profiling, i.e. an automated assessment of certain personal factors based on your data. This helps us tailor our communication and promotional materials to better match your interests. We create your profile using data such as your location, user type, status and type of sports pass purchased, facilities visited, gender, and age. We also consider statistical data about your behaviour when using our services.

WHO HAS ACCESS TO YOUR PERSONAL DATA?

The recipients of your personal data will be:

- a) Entities processing personal data on behalf of the Controller to the purpose of the fulfilment of the purposes for which the data are collected (in particular, entities providing IT solutions and IT and technical support services). These entities must have access to the data in order to perform their duties on our behalf. These entities will only have access to personal data to the extent necessary to perform the tasks incumbent upon them;
- b) To a limited extent: the entity that has enabled you to use our services;
- c) Entities authorised by you;
- d) To a limited extent: payment intermediaries;
- e) To a limited extent: our partners (in particular: sports facilities) whose services you use.

CAN YOUR PERSONAL DATA BE TRANSFERRED OUTSIDE THE EUROPEAN ECONOMIC AREA?

In order to ensure the highest possible quality of our services, we use other suppliers, e.g. for IT support. Accordingly, your personal data may be transferred outside the European Union. We assure you that, in such a case, the transfer of data will be based on an appropriate agreement between us and such an entity. This agreement will contain standard data protection clauses adopted by the European Commission or made effective pursuant to a relevant decision of the European Commission.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

The duration of data processing is related to the purposes and grounds for processing:

- a) The data processed on the basis of the legitimate interest of the Controller will be processed until an objection is successfully lodged or this interest ceases, e.g. data processed for the purpose of investigating or defending against claims will be processed for a period equal to the period of limitation of these claims;
- b) The data processed on the basis of consent will be processed until the consent is withdrawn. This period may be extended by the period of limitation for the investigation or defence against possible claims;
- c) For the period of the effectiveness of the service agreement until the performance is over or the services are completed, and thereafter for the period of time necessary for the effective assertion or defence of claims, which is normally three (3) or six (6) years, but may be shorter or longer in situations defined by law;
- d) Until the fulfilment of legal obligations, in particular tax and accounting obligations;
- e) Up to five (5) years: in connection with the recording of calls on our hotline.

IS IT OBLIGATORY TO PROVIDE THE PERSONAL DATA?

The provision of personal data is voluntary, albeit necessary for the purpose you wish to fulfil, including, for instance, to use the services/online services, to obtain a response to an enquiry or issue raised. Your failure to provide data may result, in some cases, in our inability to provide you with services or take other action.

WHAT ARE YOUR RIGHTS IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA?

You are entitled to:

- a) Request access to your personal data, rectification, erasure or restriction of processing, as well as the right to data portability;
- b) At any time, object to the processing of personal data on grounds related to your particular situation – if the personal data processing is based on the legitimate interests of the Controller;
- c) At any time, object to the processing of personal data for the purposes of carrying out marketing activities, without having to justify your decision, when the legitimate interest lies in carrying out direct marketing activities;
- d) Withdraw consent at any time without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal;
- e) Lodge a complaint with the supervisory authority, i.e. the President of the Personal Data Protection Office (UODO).

A request for the exercise of your rights can be made to the contact details specified at the beginning of this document.

Detailed information on the exercise of rights is available in the "Procedure for the Exercise of Rights" file.

COOKIE POLICY

Our services use cookies. By using our services, you consent to the use of cookies in accordance with your current browser settings.

1. What are the Cookies for?

For your convenience, the website uses cookies to adapt the website to your needs and for statistical purposes. The cookies are small text files sent by a website visited by an internet user to the internet user's device. Cookies are also used by websites to which we refer, e.g. multimedia. You can change your cookie settings in your browser. If you do not change these settings, you agree to the cookies used here.

2. What Cookies are Used by Medicover Sport?

The websites use performance cookies, i.e. to collect information about how the website is used so that it works better, and functional cookies, i.e. to remember the user's settings (e.g. language, font size). These include:

- (a) google-analytics.com cookies - statistics for the services,
- (b) session cookies (they expire at the end of each session).

We use analytics and advertising cookies from third-party providers that may be loaded through our services.

Please find below information on the third parties that provide us with cookie-based technology:

Google (Google Universal Analytics)

Please get to know more about:

- [Google's Privacy Policy](#)
- [Google's Cookie Policy](#)

SALESmanago

- Visit Salesmanago.co.uk

LinkedIn

Please get to know more about:

- [LinkedIn's Privacy Policy](#)
- [LinkedIn's Cookie Policy](#) and [the cookie table used by LinkedIn](#)

Facebook (Meta)

Please get to know more about:

- [Facebook Privacy Policy](#)
- [Facebook Cookie Policy](#)

Microsoft, Microsoft Advertising/Bing Ads, Microsoft Clarity

Please get to know more about:

- [Microsoft Privacy Policy](#)

ConsentManager

Please get to know more about:

- [Privacy Policy ConsentManager](#)

YouTube

Please get to know more about:

- [YouTube's Privacy Policy](#)

3. How to Increase the Level of Protection?

The level of protection against cookies can be set in the web browser that you use – up to and including the possibility of blocking all cookies completely. This increases the level of security and data protection, but may also prevent certain functions, such as logging in. You can find more information about cookies in the "Help" section of your browser menu.

4. How to change the settings of the most popular search engines?

You may opt out of the collection of cookies by selecting the appropriate settings on the browser you use to connect to our services. However, please note that if you do so, you may find it difficult or even impossible to use all the features of the website.

More information:

- a) [Chrome](#),
- b) [Firefox](#),
- c) [Safari](#),
- d) [Opera](#),
- e) [Edge](#),
- f) [Internet Explorer](#).

More detailed information on cookies is available at <https://www.aboutcookies.org> and <https://wszystkoociasteczkach.pl>.

Medicover Sport sp. z o.o. reserves the right to make changes to the content of the Privacy Policy in the event of changes in legislation or implementation of new technical and/or IT solutions.