

PRIVACY POLICY

1. PRIVACY POLICY OBJECTIVE AND ITS APPLICATION

MB “Vera Aegis” (hereinafter referred to as the “Company”) values your trust and is committed to ensuring proper protection of your personal data. We respect your privacy and pledge to process and protect your personal data in a fair and lawful manner in accordance with the applicable legal requirements of the European Union (General Data Protection Regulation 2016/679) (hereinafter referred to as the “GDPR”) and the Republic of Lithuania.

In this privacy policy (hereinafter to as the “Privacy policy”), we provide you with information on how Company processes personal data: when the Company publishes information about the quality of healthcare services (plastic surgery procedures), patients’ personal experiences, healthcare professionals and other information related to the provision of healthcare services. We process the personal data also when you visit the Company’s website or the Company’s social media accounts, when you submit inquiries, etc.

Please note that additional information might be provided in Terms and Conditions, contracts and other documents provided by us.

We may change this Privacy policy at any time at our sole discretion, therefore, you have a responsibility to make sure that you are familiar with the latest version of the Privacy policy.

2. DEFINITIONS

The following definitions when used in this Privacy policy have the same meaning as stipulated in the GDPR and is as follows:

Personal data means any information relating to 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, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Personal data processing means any operation or set of operations which is performed on personal data or on sets or personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Company means MB “Vera Aegis”, legal entity code 306405115, J.Savickio str. 4-7 Vilnius, the Republic of Lithuania.

3. CONTACT INFORMATION

Due to the requirements of the GDPR, the Company has appointed Data protection officer.

If you would like to find out how we process your personal data or if you wish to exercise any of your rights as a data subject, please contact our data protection officer via e-mail info@therealpatients.org.

You can contact Company also via e-mail info@therealpatients.org or mail J.Savickio str. 4-7 Vilnius, Vilnius, the Republic of Lithuania.

4. PROCESSING OF PERSONAL DATA FOR WEBSITE ACCOUNT REGISTRATION AND ADMINISTRATION

To access all services and opportunities provided by the Company, including submitting feedback about a plastic surgery procedure you have undergone, it is necessary for you to create personal account on the website www.therealpatients.com.

For this purpose, the Company needs to process the following personal data:

| Whose personal data are processed? | What is the legal basis for such processing? | What personal data are processed? | Who receives the personal data? | How long do we keep the data? |
|------------------------------------|--|-----------------------------------|---------------------------------|-------------------------------|
| Account registration | | | | |

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|---|--------------------------------------|--|--|--|
| Data subject | Article 6 (1) (b) of GDPR (contract) | Name, surname, phone number, email address, gender, address | IT service providers | Personal data is only used during the account registration process |
| Account user identity verification | | | | |
| Account user | Article 6 (1) (b) of GDPR (contract) | Name, surname, personal identification number, nationality and other details specified in the identity document | IT service providers, external verification service provider | 3 years from the identity verification |
| Account administration | | | | |
| Account user | Article 6 (1) (b) of GDPR (contract) | Name, surname, email address, phone number, address, date of birth, posted feedback about healthcare services, account password, chosen nickname, account login details, account creation date, other actions performed within the account | IT service providers | 5 years from the most recent login |

5. DISSEMINATION OF INFORMATION ON PLASTIC SURGERY

The Company aims to publicize and spread information regarding healthcare services (specifically plastic surgery procedures) and the healthcare professionals who provide these services, including the quality of the procedures they perform.

In order to provide information, the Company needs to process the following personal data:

| Whose personal data are processed? | What is the legal basis for such processing? | What personal data are processed? | Who receives the personal data? | How long do we keep the data? |
|--|--|---|---|--|
| Publication of healthcare professionals' profiles | | | | |
| Healthcare professionals | Article 6 (1) (f) (legitimate interest) | Name, surname, profession, education, workplace, location (country), feedback about healthcare services (including responses) | IT service providers, other website's visitor | 5 years from the most recent data update (new feedback, update on the other information) |
| Sharing patient reviews about received healthcare services (plastic surgery procedures) | | | | |

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|-------------------------|---|---|---|--|
| Patient | Article 6 (1) (a) of GDPR (consent) and Article 9 (2) (a) of GDPR consent | Nickname / name and surname, age, gender, provided healthcare service (date, location, nature), health condition, medical complications and other medical personal information, paid price (payment documents) for healthcare services, location (country), image, other information provided in the review | IT service providers, other website's visitor | 5 years from the publication of the review |
| Healthcare professional | Article 6 (1) (f) of GDPR (legitimate interest) | Name, surname, workplace, provided healthcare services, date, review of the provided healthcare services (feedback), price of the said service, other information provided in the patient's review | IT service providers, other website's visitor | 5 years from the publication of the review |

6. PROCESSING OF PERSONAL DATA RELATED TO FORUM ADMINISTRATION

The Company aims to establish a secure environment where individuals can openly discuss and express their opinion on various aspects of plastic surgery procedures. To achieve this goal, forums are created on the website where individuals can voice their opinions. To facilitate this, the Company need to process the following personal data:

| Whose personal data are processed? | What is the legal basis for such processing? | What personal data are processed? | Who receives the personal data? | How long do we keep the data? |
|------------------------------------|--|--|---|--|
| Forum administration | | | | |
| Data subject | Article 6 (1) (a) of GDPR (consent) | Nickname / name and surname, posted comment, date and time, other information provided by the individual in the comment. | IT service providers, other website's visitor | 10 years from the moment the specific comment is expressed |

7. PERSONAL DATA RELATED TO PUBLISHING ARTICLES ABOUT PLASTIC SURGERY PROCEDURES AND OTHER RELATED INFORMATION

The Company aims to publish as much information as possible about plastic surgery procedures, their execution and other related information.

| Whose personal data are processed? | What is the legal basis for such processing? | What personal data are processed? | Who receives the personal data? | How long do we keep the data? |
|------------------------------------|--|-----------------------------------|---------------------------------|-------------------------------|
|------------------------------------|--|-----------------------------------|---------------------------------|-------------------------------|

| Publication of the article | | | | |
|---------------------------------------|--|---|---|---|
| Author of the publication | Article 6 (1) (b) of GDPR (contract) and Article 6 (1) (f) of GDPR (legitimate interest) | Name, surname, profession and creative activity | IT service providers, other website's visitor | 5 years from the publication of the article |
| Other people mentioned in the article | Article 6 (1) (f) of GDPR (legitimate interest) | Name, surname, image, other data specified in the article | IT service providers, other website's visitor | 5 years from the publication of the article |

8. PROCESSING OF PERSONAL DATA RELATED TO THE MANAGEMENT OF THE "FIND A SPECIALIST" SECTION

The Company wants to create an opportunity for its visitors to find and contact healthcare specialists, experts in other fields who can assist visitors with issues related to plastic surgery procedures.

| Whose personal data are processed? | What is the legal basis for such processing? | What personal data are processed? | Who receives the personal data? | How long do we keep the data? |
|--|---|--|---|--|
| Management of the "Find a Specialist" section | | | | |
| Specialist | Article 6 (1) (a) of GDPR (consent) and Article 6 (1) (f) of GDPR (legitimate interest) | Name, surname, profession, contact details, education, feedback about provided services. | IT service providers, other website's visitor | 5 years from the moment certain information about specialist is posted |

9. PUBLICIZING THE COMPANY'S ACTIVITIES ON SOCIAL MEDIA PLATFORMS

| Whose personal data are processed? | What is the legal basis for such processing? | What personal data are processed? | Who receives the personal data? | How long do we keep the data? |
|---|---|--|---|---|
| Publicizing the company's activities on social media platforms | | | | |
| A person who has given consent | Article 6 (1) (a) of GDPR (consent) and Article 9 (1) (a) of GDPR (consent) | Nickname / name, surname, provided healthcare services, medical complications, personal experience, image (photo, other information provided by the individual | IT service providers, social media accounts visitors, | 5 years from the date of consent received |

10. PROCESSING PERSONAL DATA FOR RECRUITING PURPOSES

| Whose personal data are processed? | What is the legal basis for such processing? | What personal data are processed? | Who receives the personal data? | How long do we keep the data? |
|------------------------------------|---|---|---------------------------------|--|
| Recruitment | | | | |
| Candidate | Article 6 (1) (a) of GDPR (consent) and Article 6 (1) (f) of GDPR (legitimate interest) | Name, surname, workplace, email address, date of birth, address, education, phone number, desired position, CV, personal qualities, work experience, proficiency in foreign languages, ability to work with computer programs, desired salary, other information provided in the CV, recommendation and or motivational letter, information in the candidate's public social media profiles, etc. | IT service providers | Within 3 working days following the conclusion of the selection process or the decision to terminate the selection process, unless the candidate has consented to the processing of personal data for a duration of 1 year |

11. ACCOUNTING

| Whose personal data are processed? | What is the legal basis for such processing? | What personal data are processed? | Who receives the personal data? | How long do we keep the data? |
|---|--|---|---|--|
| Accounting | | | | |
| Customers, employees of customers, other natural personas | Article 6 (1) (c) of GDPR (legal obligation) | Name, surname, information about received/provided services, payment card details, other personal data indicated in invoices and other accounting documents | IT service providers, payment services provided | The data is stores according to the deadlines set by the legislation regulating accounting |

12. DEFENSE OF LEGITIMATE INTEREST

| Whose personal data are processed? | What is the legal basis for such processing? | What personal data are processed? | Who receives the personal data? | How long do we keep the data? |
|---------------------------------------|--|-----------------------------------|---------------------------------|-------------------------------|
| Defense of legitimate interest | | | | |

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|------------------------------------|---|---|--|--|
| Clients, candidates, other persons | Article 6 (1) (f) of GDPR (legitimate interest) | All personal data processed for aforementioned purposes are essential for safeguarding and defending the Company's legitimate interests in cases of disputes with individuals | IT service providers, Courts, attorneys, bailiffs, | 5 years from the date the court decision becomes final |
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13. CONTACT US

There are several ways how you can contact: by phone, e-mail, via social media accounts. We personally accept, review and reply to all messages. If you contact us, we can process the following data belonging to you: name, surname, e-mail address, IP address, phone number, date, your nickname used in social media networks, and text of messages.

Such data will be processed in order to answer your questions. If you do not provide your contact details, we will not be able to contact you.

Electronic messages will be stored for 1 (one) year as of the receipt of the last message of the particular conversation except for information that must be stored for other terms pursuant to the Privacy Policy or legal acts.

All personal data provided by you in the course of communication with us will be used only for the aforementioned purposes and to review messages and administer and manage the communication flows. We undertake not to use your personal data without your express consent in any publications in such a way that would allow identifying you.

Please note that we may have to contact you by post, e-mail or phone. Please notify us of any changes of your personal data.

14. PERFORMANCE OF THE COMPANY'S AGREEMENTS

The Company also processes personal data of employees of its service providers (legal persons) and service providers (natural persons) in order to perform the agreement concluded between the Company and the aforementioned persons. In such case, the Company will process the following personal data of the aforementioned natural persons: name, surname, date of birth, phone, e-mail address, messaging content, date, and other data related to the performance of the agreement.

The basis for the processing of data of customers, employees of service providers of the Company is the legitimate interest of the Company.

If you provide services or sell goods as a natural person, the Company will process your personal data on the basis of performance of the agreement.

Personal data indicated in this section will be processed as long as the agreement is in effect. If personal data are indicated in the agreement, they will be stored for 10 years as of the date of expiration of the agreement.

15. DIRECT MARKETING (NEWSLETTER)

In cases you provided your contact information and expressed explicit consent to receive marketing information from us, the Company' may contact you via e-mail providing you with the information about the Company's services or submit other promotional material. We may send out newsletters and other advertising material.

We may process the following personal data for direct marketing purposes: e-mail address, other information that person may provide, date of consent.

Your data will be used for direct marketing purposes for 2 (two) year as of the receipt of your consent or after provision of services.

You have the right to refuse direct marketing at any time by contacting us via e-mail on info@therealpatients.org.

16. ADMINISTRATION OF SOCIAL MEDIA ACCOUNTS

Please note that information you provide us through social media accounts (including messages, "Likes", "Follows", etc.) is controlled and processed by the social media network operator.

Our website contains links to our social media accounts. We currently have accounts on "Instagram" - @the_real_patients, "Facebook" - @The Real Patients.

We process the information provided in our accounts for the purpose of administering accounts based on your consent.

We recommend that you read the privacy notices of third parties and contact the service providers directly if you have any questions regarding use of your personal data.

17. DATA PROCESSORS. DATA RECIPIENTS

We can disclose your personal data to our employees, service providers, your Bank.

Moreover, we can disclose information about you:

- If we must do this under the law (state institutions, law enforcement institutions and other persons in accordance with the procedure established by laws of the Republic of Lithuania);
- In order to protect our rights or interests (including the provision of your data to third parties in order to recover your debts to us);
- In order to sell a part of Company's activities or assets, where we disclose your personal data to the potential buyer of the activities or a part thereof;
- Having sold the activities of the Company or a substantial part thereof to third parties.

We may also provide personal data to other persons upon receiving your written consent.

Your personal data may be transferred to third countries and/or international organizations. In this case, the Company undertakes to ensure all appropriate personal data security measures and to fulfill all legal obligations for the data transfer to third countries and/or international organizations.

If we disclose your personal data to groups of recipients other than those specified in this Privacy policy, we will inform you as soon such personal data are disclosed for the first time, unless we have already provided you such information earlier.

18. COOKIE POLICY

We may use cookies on this website.

Cookies are little text files which are stored on the Internet browser or hard drive of your computer or mobile device when you visit our website. Cookies work to make your experience browsing our website as smooth as possible. They are designed to improve the functionality and use of the website, also for the purposes of analysis.

We monitor traffic of the website and collect information on the number of visitors browsing the website, the domain name of internet service providers of visitors, etc.

Cookies can be stored for varying lengths of time on your Internet browser or device.

Most Internet browsers accept cookies, but person can change the Internet browser settings so that cookies would not be accepted. However, in this case, some functions may not work.

All information about cookies used by this website, their purpose, validity and the data used are given in the table below:

| Cookie | Expiry date | Purpose |
|------------------------------|-------------|---|
| _ga, Google | 2 years | Registers a unique ID that is used to generate statistical data on how the visitor uses the website. |
| _ga#, Google | 2 years | Used by Google Analytics to collect data on how many times a user has visited the website, as well as the dates of their first and last visits. |
| _gid, Google | 1 day | Registers a unique ID that is used to generate statistical data on how the visitor uses the website. |
| experiment_variation, Google | 30 days | Used by Google Analytics to collect data on which website configuration the user has viewed. |
| _GACookieID, Google | 300 days | Used by Google Analytics to collect data on the browsing history. |

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|-----------------------------|--|---|
| _hjDonePolls, Hotjar | 1 year | Designed to prevent survey forms from being shown repeatedly. |
| _hjMinimizedPolls, Hotjar | 1 year | Intended to prevent survey forms from being displayed repeatedly. |
| _hjSessionUser, Hotjar | 1 year | Collects statistics about the visitor's site visits, such as the number of visits, average time spent on the site, and which pages were viewed. |
| _hjIncludedInSample, Hotjar | 365 days | Used for creating heatmaps and analyzing user behavior on the website. |
| s_sq, Adobe Analytics | Session | Used to store data on where and what visitors click in Adobe Analytics' Activity Map feature. |
| s_cc, Adobe Analytics | Session | Used to collect traffic statistics and monitor website performance. |
| _gcl_au, Google | 3 months | Used by Google AdSense to experiment with ad effectiveness on websites that use their services. |
| _fbp, Meta Platforms, Inc. | 3 months | Used by Facebook to deliver a range of advertising products, such as real-time offers from third-party advertisers. |
| fr, Meta Platforms, Inc. | 3 months | Used by Facebook to deliver a variety of advertising products, such as real-time offers from third-party advertisers. |
| IDE, DoubleClick | 13 months EEA UK / 24 months elsewhere | Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user. |
| DSID, DoubleClick | 2 weeks | used to identify a signed-in user on non-Google sites so that the user's ads personalization setting is respected accordingly. |

19. SECURITY OF YOUR PERSONAL DATA

Your personal data will be processed pursuant to the requirements set out in GDPR, the Republic of Lithuania Law on Legal Protection of Personal data and other legal acts.

In the course of processing your personal data, we implement organizational and technical measures which ensure the protection of personal data from accidental or unlawful destruction, alteration, disclosure and any other unlawful processing. These measures may include, among other, encryption, physical access security, auditing and other appropriate technologies.

20. YOUR RIGHTS

This section contains information about your rights related to the processing of your personal data carried out by us and cases where you can exercise these rights. If you would like to receive more information on your rights or to exercise them, please contact us via e-mail indicated in this Privacy policy.

We will provide information on actions taken on a request with regard to implementation of your rights without undue delay and in any event within 1 (one) month of receipt of the request. In consideration of the request complexity and the number of received requests, the aforementioned term may be extended for 2 (two) further months. In this case, we will notify you of such term extension and reasons for it within 1 (one) month as of the receipt of request. We will refuse to implement your rights only in cases provided for in the legal acts.

Your rights are as follow:

The right to be informed

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this Privacy policy.

The right of access

We want you to fully understand how we use your personal data and not to experience any inconvenience because of that. You can contact us at any time and ask if we process any of your personal data. If we store or use your personal data in any way, you have the right to access them.

We will provide access to the personal data we hold about you as well as the following information: the purposes of the processing, the categories of personal data concerned, the recipients to whom the personal data has been disclosed, the retention period or envisioned retention period for that personal data, when personal data has been collected from a third party, the source of the personal data.

The right to rectification

When you think we process inaccurate or incomplete personal information about you, you may exercise your right to correct or complete certain personal data. This may be used with the right to restrict processing to make sure that incorrect / incomplete personal data is not processed until it is corrected.

The right to restrict processing

You have the right to ask us to restrict the processing of your personal data or to object to their processing:

- During the period required for us to verify the accuracy of your personal data when you submit claims with regard to data accuracy;
- In cases of unlawful collection, storage or use of your personal data where you decide not to request of data;
- When we no longer need your personal data, but you need them for the establishment, exercise, or defense of legal claims;
- During the period required to determine if we have an overriding legal basis to continue processing your personal data if you exercise your right to object to the processing of your personal data.

The right to erasure (the right “to be forgotten”)

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have unlawfully processed. We will take all reasonable steps to ensure personal data erasure.

The right to data portability

You have the right to the portability of data obtained by us under your consent or for the purpose of agreement conclusion. If you exercise this right, we will transfer a copy of the data provided by you.

The right to object

You have the right to object to use of your personal data by us:

- In cases where we use such data in order to implement our legitimate interests but we do not have an overriding legal basis to continue using your personal data; or
- At any time when we use your personal data to send newsletters or for direct marketing purposes. In such case, the data will not be used for these purposes anymore; however, they may be used for other legitimate purposes.

If you believe that your rights of the data subject have been and/or may be violated, please promptly contact us via email indicated in this Privacy policy. We ensure that as soon as we receive your complaint, we will contact you within the reasonable period and inform you about the complaint handling process, and then about its result.

If the handling results are unsatisfactory to you, you will be able to submit a claim to the supervisory authority – the State Data Protection Inspectorate (www.vdai.lrv.lt).

Detail information about implementation of the data subject’s rights is provided in the Company’s Procedure for the Implementation of Rights of the Data Subjects.

21. PRIVACY POLICY REVIEW

We may update or amend this Privacy policy at any time. Such updated or amended Privacy policy will come into effect as of its publication on our website. You should check it from time to time and make sure that you find the current version of Privacy policy acceptable.

After making an update to the Privacy policy, we will notify you about any changes that we consider material by publishing them on our website.

The latest update to the Privacy policy was made on 26 August 2024.