

## PERSONAL DATA PROTECTION POLICY

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## POLICY OF THE LUSÍADAS SAÚDE GROUP

The Lusíadas Saúde Group (“**Lusíadas Group**”) endeavors to ensure the protection of its Clients’ personal data, as part of the services provided to you in our Health Units, identified at <https://www.lusiadassaud.pt/hospitais-clinicas>, and other channels we provide to you.

Data processing is crucial for us to continue to ensure that our health services, such as medical diagnosis, preventive medicine, and health services management, meet high quality standards.

This Personal Data Protection Policy (“**Policy**”) addresses the main aspects of your personal data processing, which follows the rules set forth in the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 – “**GDPR**”), thereby ensuring that we provide you concise, transparent, intelligible, and easily accessible information.

## PERSONAL DATA

**'Personal data'** means any information of any nature and on any media, including sound and image, 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 identification number, or to more factors specific to the physical, physiological, mental, economic, cultural, or social identity of that natural person;

Personal data that may be more sensitive in nature under certain circumstances are classified as "special categories of personal data". Such categories may concern your racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, biometric identifiers, sex life, sexual orientation, or your health.

**'Data concerning health'** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her past, present, or future health status.

## CONTROLLER

As a rule, when a Client goes to one of our Health Units, such Health Units provide services to that Client and determine how their data are processed in the context of those services. As such, the Health Units are, as a rule, the Controllers of the Client's personal data under the GDPR.

Whenever you are treated at one of the **Health Units**, the Controller of the data required to provide health services (e.g., for the purposes of preventive medicine, medical diagnosis, administrative management of medical records, scheduling appointments and exams, admission and delivery of exams, electronic prescription of medicines and supplementary diagnostic tests) will be the Health Unit that provides you with such services.

The **Health Units** will also oversee the processing of data for purposes related to internal auditing and compliance of the Health Units' systems and processes, protection of people and property, and security of the Units' facilities (through video surveillance systems).

Regarding the Lusíadas Health Line, the **Health Units** will be jointly in charge of any processing carried out (i.e., they process data jointly) for purposes (i) related to the Lusíadas Health Line, including telemedicine, and (ii) of call recording to prove communications in the context of the relationship we have with you and monitoring the Lusíadas Health Line's service quality.

Our corporate service center that brings together all Health Units, **Lusíadas A.C.E.**, will act as Controller for the purposes of: (i) sending information and marketing communications about the services of the Hospital Units and care to be taken in promoting health in general, (ii) conducting opinion polls and surveys on the services provided, (iii) managing the subscription and sending our free e-newsletter, (iv) managing and customer service in our contact centers (v) recording calls for proof of communications in the context of the relationship we have with you and monitoring our contact centers' service quality, as well as (vi) managing external communications with the media and holding events.

**CATEGORIES OF PERSONAL DATA PROCESSED AND HOW SUCH DATA ARE COLLECTED**

We collect your data directly, such as when the Client or potential Client schedules an appointment or exam, when you go to an appointment / get an exam, when you contact us or when you use the Portal or the “+ Lusíadas” App (<https://maislusiadas.pt/Portal/Login>). We may receive your personal data indirectly through our service providers who provide services to you on our behalf or our partners. For more information about the data we share with other entities, please refer to the “SHARING DATA WITH THIRD PARTIES” section below.

Personal data we process may include personal data directly or indirectly related to your health.

CATEGORIES OF PERSONAL DATA	DATA COLLECTION
<p><b>Identification, contact and billing data:</b> name, date of birth, gender, telephone/mobile number, e-mail and VAT number;</p> <p>Service User card number, country, district and municipality of birth, profession, professional status, health center, GP, marital status, spouse's name, father's name, mother's name (if Client is a minor), data related to your insurance or health subsystem (when you want the</p>	<p>When the Client file is created, either in person at the desk of one of our Health Units or by telephone or computer systems.</p>

<p>services provided by the Health Unit to be covered by such insurance).</p>	
<p><b>Client number</b> (encrypted information that allows the system to identify the client).</p>	<p>When creating/opening the Customer file.</p>
<p><b>Information on your appointments, consultations or exams</b> (including the Health Unit, the date and time of the appointment, the doctor's specialty, the exam to be performed / performed, data on the medical prescription, among others required to provide the services); call recording, if the appointment / request for clarification / complaint is made through the Contact Center.</p>	<p>When you schedule an appointment / when you request information through the different channels (e-mail, telephone, Lusi Digital Assistant, Portal and + Lusíadas App, and sites of the Lusíadas Group).</p>
<p><b>Information collected in teleconsultations:</b> image, voice, traffic data, and information about your health.</p>	<p>When you make a teleconsultation (including direct video transmission).</p>
<p><b>Information collected on the Lusíadas Health Line:</b> identification data, voice, information about your health and others required in connection with telemedicine.</p>	<p>When you contact us through the Lusíadas Health Line or when a warning of abnormal values of the Customer is issued by the "HCAIert" App, the Customer is contacted through the Lusíadas Health Line.</p>
<p><b>Information about your health,</b> including: reason for consultation/act, personal history (childhood illnesses, immunizations, habits, gynecological history, allergies, medication, active diseases, inactive diseases), family history (most frequent conditions - diabetes, HTN, PT, cancer, living/deceased, cause of death), clinical examination, diagnoses, supplementary exams,</p>	<p>During the provision of health care.</p>

<p>referral, alerts (diabetes, hypertension, etc.), blood group; prescribed drugs, prescriber identification, prescription site code and prescription data and special co-payment scheme; act and heading of the relevant episode, start and end date of the episode, episode status, health professional responsible for the episode, episode no., type of episode, indication if there are results of the episode and identifier of these results; <b>genetic data and data concerning sex life and sexual orientation.</b></p>	
<p><b>Information on clinical trials/studies:</b> data concerning your health, genetic data, racial or ethnic origin and data concerning sex life and sexual orientation (to be specified by the trial/study monitor or investigator when requesting informed consent for participation in the trial/study - where applicable).</p>	<p>In connection with the participation and conduct of clinical trials or studies, if you have decided to participate in them.</p> <p>In connection with the conduct of retrospective non-interventional studies, when data collected in the context of healthcare provision are used in an anonymized or pseudonymized form.</p>
<p><b>Information relating to satisfaction polls and surveys:</b> data relating to your identification, contact and use of Lusíadas services (initially collected by the Health Unit), as well as additional information you provide in this context, such as your opinion about us.</p>	<p>When you take part in our satisfaction polls and surveys by completing them.</p>
<p><b>Contact information and suggestions:</b> data relating to your identification, contact, questions and suggestions about Lusíadas services.</p>	<p>When you contact us and/or complete the “Contact Us” form at <a href="https://www.lusíadas.pt/fale-connosco">https://www.lusíadas.pt/fale-connosco</a>.</p>
<p><b>Information for marketing purposes:</b> identification and contact data (e-mail or telephone contact) and demographic data or</p>	<p>When you use our Health Units’ services. The data initially collected by the Health Unit providing the services to you will be used if you</p>

data relating to your interests and preferences, such as: age group, gender, area of residence, the Health Units attended, frequency of visits to the Units, Unit and Service of the Health Unit (functional area) visited by the Client, consultations and clinical acts scheduled or taken by you, preferential means of payment.	have consented to the processing of data for marketing purposes and sending electronic marketing communications (e.g., through the document available at the Health Units' reception desks).
<b>Information to subscribe the newsletter:</b> e-mail	When you subscribe the Lusíadas Group's e-newsletter.
<b>Information about how you use our sites and apps,</b> such as: IP of the device you use to access them, the date and time of the start and end of the visit to the sites, the user's browser history or information collected through cookies.	When you use our websites and apps, in accordance with the Privacy and Cookie Policies of those websites (e.g. <a href="http://www.lusiadadas.pt">www.lusiadadas.pt</a> ).
<b>Video surveillance information:</b> image	When you visit our premises with video surveillance cameras.

## PROCESSING PURPOSES

The Clients' personal data are processed to provide health care and services, including to manage the Health Units' systems and services. Should you decide to provide your personal data for other purposes, or if the Health Units must comply with legal obligations requiring the processing of your personal data, we may process such data for the relevant purposes. We may therefore use your personal data for the following purposes:

PURPOSE	DETAIL
<b>Provision of health care</b>	To be able to provide our services, we use your information above for preventive medicine, appointment scheduling, exam scheduling, medical diagnosis, provision of health care and treatment, electronic prescription of medicines and

	<p>supplementary exams, and billing for the services provided to you.</p>
<p><b>Management of the relationship with the Client</b></p>	<p>We may contact you by phone, letter, email, SMS or through your personal area on the Portal or the +Lusíadas App, for administrative or operational reasons, for example, to send you confirmation of your appointments and payments, to inform you of any changes or unforeseen events about your appointments, or to send you invoices. We may also contact you by email or SMS to provide access to the results of your medical exams performed at our Health Units (by sending a link to download the results and / or consult them on the Portal and + Lusíadas App).</p> <p>As these communications are not made for marketing purposes, you will continue to receive them even if you have opted out of receiving marketing communications.</p> <p>We also use your personal data to address your requests, suggestions, contacts, or complaints (including via the “Contact Us” form).</p>
<p><b>Management of the Lusíadas Health Line</b></p>	<p>For the provision of healthcare services, such as telemedicine.</p> <p>The call will be recorded for proof of communications made as part of the contractual relationship we have with you and to monitor the quality of the service.</p>
<p><b>Performance of clinical studies and trials</b></p>	<p>If you wish to be part of clinical studies/trials, we use your data for the conduct and performance of the clinical study/trial.</p>
<p><b>Performance of retrospective studies</b></p>	<p>We may conduct retrospective (non-interventional) studies based on anonymized data or, if it is not possible to conduct the study based on such data, on pseudonymized data, exclusively for scientific research purposes.</p>

<p><b>Promotion of our services and news of interest to you</b></p>	<p>We may send you information and marketing communications, if you have indicated that you wish to receive them and/or have not objected to receiving them, informing you of all the services we provide and care to be taken in promoting health, in general, or communications tailored to your interests and preferences, determined based on your profile data (which will not be shared with third parties), and which will allow us to get to know you better and provide you with an excellent service in the Health Units. Your profile will be created based on personal data such as your age group, your gender, your area of residence, the Health Units you attend, the frequency of visits, consultations and clinical acts scheduled or performed by you, and preferred means of payment. The profile will be created for the sole purpose of sending marketing communications and offering Lusíadas Group products and services, and no automated individual decisions will be made based on it.</p>
<p><b>Sending the e-newsletter</b></p>	<p>We will send you our e-newsletter, which aims to provide useful information on health and promoting healthy living, if you have subscribed to it.</p>
<p><b>Conducting satisfaction surveys and polls</b></p>	<p>We carry out satisfaction surveys and polls with our Clients, with their consent, in order to further our motto “We know how to Care”.</p> <p>We may engage service providers to carry out the polls and surveys, who will only process the data for these purposes. For more information see the section “<a href="#">SHARING DATA WITH THIRD PARTIES</a>”.</p>
<p><b>Provision and analysis of the use of sites and apps</b></p>	<p>When you use our sites and apps, we collect information required to manage and maintain the security of these channels, as well as information you submit to us when you fill</p>



	<p>out online forms (e.g. “Contact Us” form). We may collect some additional data about how you use our sites and apps to understand your interaction with them if you give your consent to the placement of certain cookies (including analytics cookies). For more information on such processing and the cookies we use, please refer to our <a href="#">Cookie Policy</a>.</p>
<p><b>Protection of persons and property</b></p>	<p>We process your personal data to ensure the protection of persons and property and the security of the premises (through video surveillance systems).</p>
<p><b>Management of health services and other support activities</b></p>	<p>We may also process your personal data for the purposes of administrative and financial management of the systems and services of the various Health Units, including for the purposes of complying with legal obligations, certification, evaluation, and assessment of service levels, conducting audits, fraud detection and analysis, for the exercise and defense of legal claims, as well as for the development and maintenance of systems.</p>

## LEGAL BASES FOR PROCESSING

We always process your personal data in strict compliance with the law. The GDPR requires the Controller to always have an adequate legal basis to be able to process data lawfully. Therefore, in accordance with the applicable legislation, the processing of your personal data will be based on the following bases:

PURPOSE	BASIS
<p>Provision of health care to our clients and management of the relationship between the Client and the Health Units</p>	<p>Performing the health services agreement in place with the Client or taking pre-contractual measures at the request of the Client/potential Client (e.g., when it concerns the scheduling of an appointment or clinical act</p>

	<p>or the provision of medical exams carried out in our Health Units).</p> <p>Where processing relates to special categories of data, such as data concerning health, the processing will be based on its necessity for the purposes of preventive medicine, medical diagnosis, provision of health care or treatment.</p>
Management of the Lusíadas Health Line	<p>The data collected during the call (including your health data) will be processed on the basis of the existing contractual relationship or for pre-contractual measures at the request of the Customer/Potential Customer.</p> <p>Where processing relates to special categories of data, such as data concerning health, the processing will be based on its necessity for the purposes of preventive medicine, medical diagnosis, provision of health care or treatment.</p> <p>Based on the Client's consent, the call will be recorded for proof of commercial transactions and other communications made as part of the contractual relationship and for monitoring the quality of service.</p>
Performance of clinical studies and trials	<p>Based on the express consent of the Client, where such studies or trials cannot be carried out using anonymized data.</p> <p>In this context, consent may be sought more broadly, to encompass several areas of research, or may be given only for certain specific research areas or projects.</p> <p>As a rule, in the context of studies/trials, Health Units will act as Processors (the Controllers being the promoters of the study/trial) and may collect your consent in the name and on behalf of the promoters (if this is the applicable</p>

	<p>basis); should the Health Units act as Controllers, they will ask for consent on their behalf (if this is the applicable basis).</p>
<p>Performance of retrospective studies</p>	<p>On the basis of the compatibility of the processing of data initially collected for the purposes of providing healthcare with the further processing of such data for scientific research purposes.</p> <p>You may object to the processing of your data for this purpose at any time and on grounds relating to your particular situation.</p>
<p>Sending information and marketing communications, tailored to the Client's profile, to customize and improve their experience as a Client.</p>	<p>On the basis of the express consent of the data subject / Client.</p> <p>You may withdraw your consent at any time, without affecting the processing carried out up to that date on the basis of the consent previously given. If you no longer wish to receive marketing and information communications, simply click on the unsubscribe link in the communication you receive. For more information about your rights, see the "YOUR RIGHTS" section.</p>
<p>Sending the e-newsletter</p>	<p>On the basis of the consent of the data subject / Client.</p> <p>If you no longer wish to receive the newsletter, simply click on the unsubscribe link at the end of the newsletter or click on this option in your private area on the Portal or the +Lusíadas App.</p>
<p>Conducting Client satisfaction surveys and polls</p>	<p>On the basis of the consent of the Client.</p> <p>You may withdraw your consent at any time. This does not affect the processing carried out up to that date on the basis of the consent previously given. For more</p>

	information about your rights, see the “YOUR RIGHTS” section.
Provision and analysis of the use of sites and apps	Based on the necessity of the processing for the pursuit of legitimate interests of the Controller or based on the consent of the data subject / user, as applicable.
Protection of persons and property	Based on the necessity of the processing for the pursuit of legitimate interests of the Controller.
Management of health services and other support activities	Based on the necessity of the processing for the pursuit of the legitimate interests of the Controller or a third party, to comply with a legal obligation incumbent upon the Controller, and for the purposes of managing health systems and services.  Processing may also be carried out on the basis that it is required for the establishment, exercise or defense of legal claims.

**STAFF AUTHORIZED TO ACCESS YOUR DATA**

Our access control system ensures that only doctors and healthcare professionals assigned to the provision of your health care and bound by professional secrecy have access to such data. Otherwise, where your health data and other special categories of data are accessed by employees not bound by professional secrecy obligations, we will ensure that such employees undertake appropriate confidentiality obligations and that such persons will only process your data subject to the responsibility and supervision of a professional bound by professional secrecy.

Examples of cases where administrative staff have access to your health data and other special categories of data include the processing of data for the purpose of billing you for health services provided to you, for the purpose of scheduling appointments and clinical acts or for managing your requests for information or complaints.

## DATA STORAGE PERIODS

The storage period of your personal data will vary depending on the purpose for which it is processed. Typically, the personal data we collect is stored in a format that allows the identification of data subjects for no longer than is strictly necessary for the purposes for which it is processed. However, in certain cases, there may be legal obligations to which we are bound, and which require us to store your data for a longer period. In particular, data concerning health are stored in accordance with the legislation applicable to the filing of hospital documentation, except for (i) the data necessary for the electronic prescription of medicines, which will be stored in accordance with Ordinance 224/2015, of 27 July 2015, as amended by Ordinance 390/2019, of 29 October 2019, and (ii) the data necessary for billing the services provided in the Health Units, which will be stored for a period of 10 years.

Regarding the data collected on the basis of your consent - to send information and marketing communications, and the e-newsletter - these will be processed until the withdrawal of consent; regarding the data processed to conduct polls and satisfaction surveys, these will be processed as long as they are required for the management / conduct of the poll or survey or until consent is withdrawn.

We also seek to observe the storage period arising from the deliberations of the Portuguese supervisory authority (*Comissão Nacional de Proteção de Dados* or “CNPD”), regarding, for example: the storage of the calls we record for proof of communications as part of the contractual relationship (90 days) and for monitoring the quality of service (30 days), for the storage of access logs (4 weeks) to the “Portal +Lusíadas” or in the context of video surveillance (30 days).

## YOUR RIGHTS

In accordance with the legal data protection regime, data subjects can at any time request access to personal data concerning them, as well as the data’s rectification, erasure or restriction of processing, the portability of their data, or object to their processing. You can exercise these rights using the contact details listed under “HOW YOU CAN CONTACT US” below or by contacting us in person at the desk of the Health Unit concerned.

In the case of information and marketing communications, you may object to the processing of your data for this purpose or withdraw your consent directly through the cancellation link at the end of the communication received or by managing your marketing preferences in your Personal Area on the Portal or the +Lusíadas App.

You have the following rights regarding your data:

**Right of Access:** the right to obtain confirmation as to whether your personal data is being processed, as well as the right to access your data and certain information, including to obtain a copy of your data being processed. This right shall not adversely affect the rights and freedoms of others, including business secrets and intellectual property rights of the Controller; your health information can be directly accessed at a Health Unit (through a specific form) or through a doctor (if you so request), including through a third party you authorize or in accordance with the law;

**Right to Rectification:** the right to obtain rectification of inaccurate personal data concerning you, as well as the right to have any incomplete data completed;

**Right to Erasure:** the right to obtain the erasure of your data in certain cases, namely if your personal data is no longer necessary for the purpose for which it was collected or processed. This right does not affect compliance with the legal obligations of the Controller to store personal data;

**Right to Restriction of Processing:** the right to request the restriction of the processing of your data in certain cases, in particular if the processing is unlawful and if you object to the erasure of the data, requesting instead the restriction of its use;

**Right to Data Portability:** the right to receive your personal data that you have provided to the Controller in a structured, commonly used and machine-readable format, including the right to transmit that data to another controller;

**Right to Object:** the right to object, at any time and on grounds relating to your particular situation, to processing of your data based on the pursuit of legitimate interests of the controller or on the compatibility of the initial processing with further processing of those data. Or the right to object at any time to the processing of your personal data for direct marketing purposes, which includes profiling for that purpose.

The law further ensures that you have the right to **withdraw your consent** to data processing for which consent is the legal basis as set out above, which does not, however, invalidate the processing carried out up to that date on the basis of the consent previously given.

The above shall apply *mutatis mutandis* to the exercise of rights by the holder of parental responsibilities or guardian in the name and on behalf of data subjects who are under the age of 16 or incompetent.

If you consider that the way we process your data is not in accordance with the law, you have the possibility, without prejudice to any other administrative or judicial remedy, to file a complaint with the CNPD or another relevant supervisory authority.

## PROCESSING DATA ON LUSÍADAS SAÚDE GROUP'S SITES AND APPS

This Policy fully applies to all users of the Lusíadas Group sites and apps. However, given the specificity inherent to their use (namely, the “Portal and the +Lusíadas App”), specific Privacy Policies have been prepared which can be consulted directly on the sites and/or the App.

## SHARING DATA WITH THIRD PARTIES

Health Units may transmit your data to each other, but only when this is necessary to provide you with appropriate and high-quality health care.

Likewise, as part of the management of health systems and services, including for the purpose of improving them, based on satisfaction surveys, we may transmit some of the data regarding the provision of services / Client satisfaction to the other entities of the health group to which the Lusíadas Group belongs.

We may also use processors for the provision of certain services (e.g., clinical analysis, pathological anatomy, radiology, collection of outstanding invoices or satisfaction surveys), who process your data on our behalf, based on contracts concluded with these entities and complying with the requirements of the applicable legislation.

We may also transmit our Clients' personal data to third parties when we believe that such data communications are necessary or appropriate (i) in light of applicable law, for the fulfillment of legal obligations/court orders, (ii) for the protection of Clients' vital interests, and (iii) to respond to requests from public or governmental authorities.

In this sense, we may transmit your personal data to the Health Regulatory Authority (ERS), the Central Administration of the Health System (ACSS), the Shared Services of the Ministry of Health (SPMS), INFARMED or the Regional Health Administrations, the Courts, Paralegals, criminal police bodies or the Public Prosecutor's Office when notified to do so or when necessary to comply with legal obligations, under the law.

For the services provided by the Health Unit to be covered by your insurance or health subsystem, your personal data, including health data related to such services, may also be communicated to the Insurance Company or the health subsystem of which you are a beneficiary, which are bound by confidentiality and will be autonomously responsible for the processing of your data. Your data may also be communicated to third parties for the purposes of certification, evaluation and assessment of the service levels of your Health Unit.

In any of the above situations, we undertake to take all reasonable steps to ensure the effective protection of the personal data we process.

## INTERNATIONAL DATA TRANSFERS

We will seek to ensure that the processing of personal data takes place within the European Economic Area (“EEA”). However, when necessary, your personal data (including health data) may be transferred and hosted outside Portugal, in countries located outside the EEA.

In this context, the Lusíadas Group will only transfer your data outside the EEA, such as to foreign Insurance Companies or Insurance Brokers, implementing the necessary and appropriate measures under applicable law to ensure the protection of personal data subject to such transfer. Your data will therefore be transferred when there is an adequacy decision by the European Commission for a particular country or when the appropriate safeguards provided by law (pursuant to Article 46 of the GDPR) are implemented, including the conclusion of standard contractual data protection clauses adopted by the European Commission and the adoption of additional measures to ensure that personal data enjoy a level of protection essentially equivalent to that existing in the European Union. Your data may exceptionally be transferred on the basis of the derogations provided for in Article 49 of the GDPR, such as your express consent to the transfer.

In addition, your browsing data on our websites, collected through cookies and similar technologies, may also be transferred outside the EEA if you have consented to the placement of certain cookies (e.g. analytics cookies). These cookies are placed by third parties that may transfer your data to countries that do not have an adequacy decision from the European Commission and that do not offer a level of protection of your data equivalent to that of the European Union (e.g. United States of America), such as the web analytics service Google Analytics, provided by Google. For more information on such processing and the cookies we use, please refer to our [Cookie Policy](#).



You can request more information on the safeguards adopted in the transfer of data and ask for a copy of the standard contractual clauses used through the contacts listed in the “HOW YOU CAN CONTACT US” section.

## SECURITY MEASURES IN PLACE

Taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of data subjects, we have implemented appropriate technical and organisational measures to ensure a level of security appropriate to those risks, such as:

- Pseudonymization and encryption of personal data, where possible;
- The ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- The ability to restore availability and access to personal data in a timely manner in the event of a physical or technical incident;
- A process for regularly testing, assessing, and evaluating the effectiveness of technical and organizational measures to ensure the security of processing.

## HOW YOU CAN CONTACT US

The Lusíadas Group has appointed a Data Protection Officer.

If you have questions or suggestions regarding the Policy or personal data processing practices, please contact us by sending an email to [protecaodados@lusiadas.pt](mailto:protecaodados@lusiadas.pt), or at the following address:

Grupo Lusíadas Saúde

C/O Data Protection Officer

Rua Laura Alves, 12 - 5º

Lisboa, Portugal

## AMENDMENTS TO THE DATA PROTECTION

We may amend or update this Policy at any time. Any amendments implemented by us will be duly updated in our Health Units, on our sites and on the Portal or +Lusíadas App. If these involve a substantial change to the way your data will be processed, we will notify you of such changes using the contact details you have provided.

Date of the last update: 14 June 2023