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| Promedica Care sp. z o.o. | <u>MAIN PROCESS</u> | <u>Procedure version</u> 1 | Page No. 1 |
| Procedure No. | <u>Procedure name</u> GDPR – Procedure for satisfying the rights of data subjects – receipt of requests | | Number of pages 5 |

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| Drafted by: | Date: |
| Approved by | Date: |

I. Objective

General objectives of the Procedure:

- To ensure personal data protection at Promedica24.
- To implement generally applicable laws arising from Regulation 2016/679 of the European Parliament and of the Council (EU) of 27 April 2016 the 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).
- To define the rules of receiving and handling requests of the data subjects whose personal data are processed by Promedica24.
- To organise and document the rules related to the satisfaction of the rights of data subjects.

II. Application

The Procedure applies across all Promedica24 companies. The Procedure applies to requests submitted to the organisation in any form and any place (whether on the phone, in person, by electronic means or by post).

III. Terms & definitions

Controller – every company from the Promedica Care Sp. z o.o. group,

Promedica24 – the Promedica Care Sp. z o.o. group of companies,

Data Protection Officer (DPA) – the person appointed by the Controller as the Data Protection Officer within the meaning of the GDPR (for Promedica24 – it is the legal department and the third parties providing personal data protection consultancy services).

Data subject – a natural person who is a data subject requesting access to their data or to information about data processing (e.g. Customer, employee, job candidate / Carer, franchisee),

Request handler – employee(s) assigned by the Controller to handle the requests,

Employee – every person authorised by the Controller to process personal data for Promedica24, notwithstanding the form of employment, job title, nature and type of job,

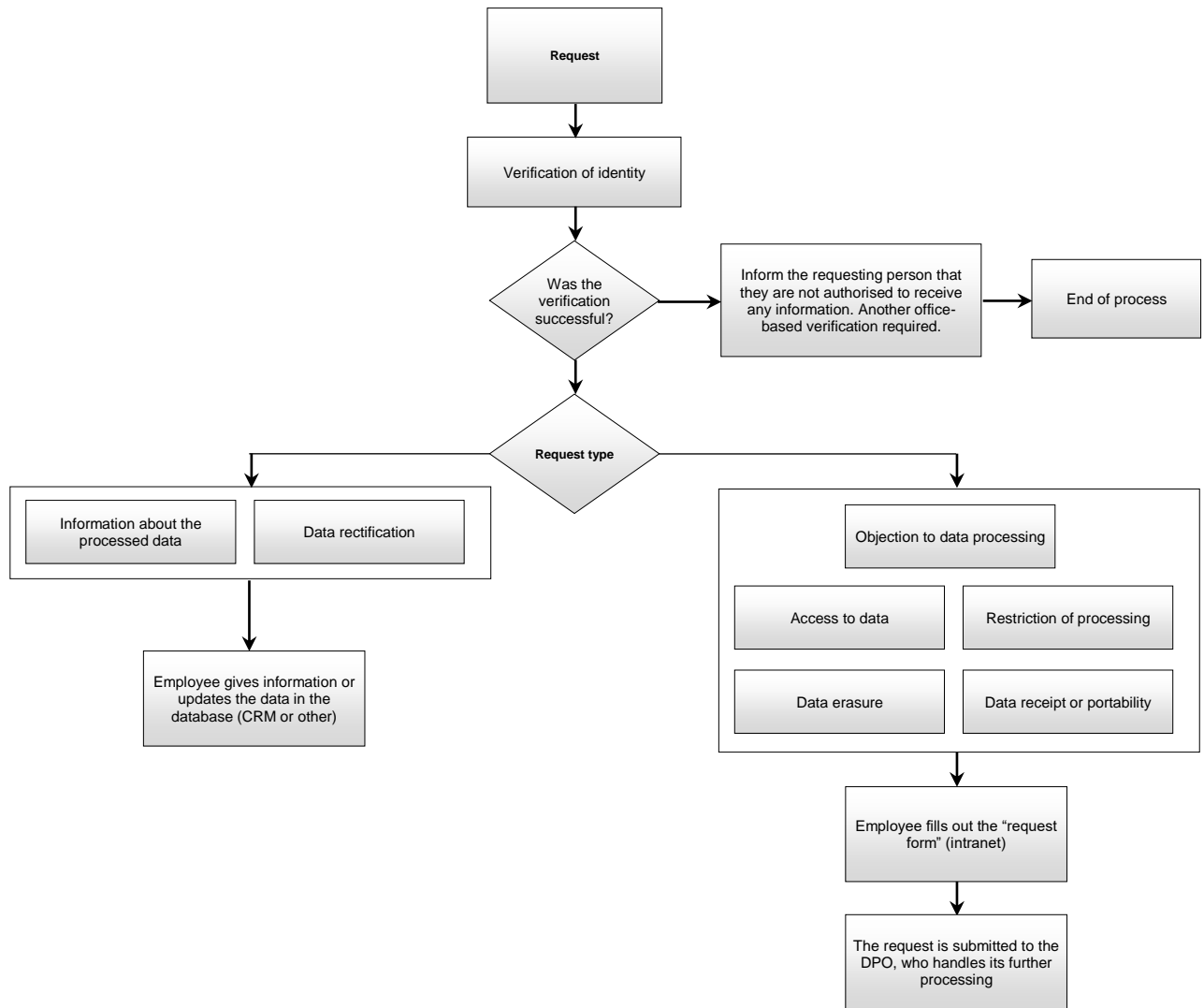
GDPR – Regulation 2016/679 of the European Parliament and of the Council (EU) of 27 April 2016 the on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation),

Request – any inquiry, report, request (notwithstanding the form/name) of a data subject regarding:

- access to their personal data or information about the processing of their personal data,
- data rectification,
- data erasure (“right to be forgotten”),
- restriction of data processing,
- information about the recipients,
- receipt of personal data or data transfer to another controller,
- objection to data processing,
- not being subject to a decision based exclusively on automated processing.

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|--------------------------------------|---|--|--------------------------------|
| Promedica Care sp. z o.o. | MAIN PROCESS | <u>Procedure version</u> 1 | Page No. 2 |
| Procedure No. | <u>Procedure name</u> GDPR – Procedure for satisfying the rights of data subjects – receipt of requests | | Number of pages 5 |

IV. Process flowchart



1. Request filed by a data subject whose data are processed by Promedica24.

A request can be submitted to Promedica24 through the following channels:

- **On the phone** – the data subject makes the request by contacting any employee of Promedica24 or on the phone to the number dedicated to every country as listed in Appendix 1.
- **By electronic means** – the data subject making the request sends an e-mail to an e-mail address dedicated to every country as listed in Appendix 1.
- **In writing** – the data subject making the request sends a notice with the request to the right Promedica24 office as specified in Appendix 1.
- **In person** – the data subject visits a field office or the headquarters.

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|--------------------------------------|--|------------------------------|-------------------------|
| Promedica Care sp. z o.o. | MAIN PROCESS | <u>Procedure version</u> | Page No. 3 |
| Procedure No. | GDPR – Procedure for satisfying the rights of data subjects – receipt of requests | <u>1</u> | Number of pages 5 |

2. Once it has been established that the communication involves a request, the request acceptance must be preceded with verification of the requesting person's identity (**see the identity verification procedure**).

2.1. If the verification was successful, the Promedica24 employee may collect detailed information regarding the request.

2.2. If the verification was not successful, the Promedica24 employee may not commence request processing because there is a suspicion that the requesting person is not the owner of the data processed by Promedica24. If this happens, the requesting person must be informed that they should contact Promedica24 in person by visiting the nearest Promedica24 office for the purpose of another verification of identity.

3. **Request acceptance** – process description

3.1. We divide requests into two groups:

3.1.1. The first one consists of requests aimed at:

- a. Obtaining information about the processed data – information about what personal data of the data subject are processed by Promedica24.
- b. Data rectification – Correction of the personal data processed by Promedica24.

PLEASE NOTE! No identification documents can be copied or scanned in the process of correcting/updating the data. Any changes related to such documents must be accepted through an application defining the scope of the changes.

For Carers, the only changes that can be accepted on the phone are changes to the contact phone number and to the e-mail address, provided that the call is recorded. Such data can be modified by every Employee with appropriate rights. Any other data changes (e.g. changes to address of residence/registered domicile, change of last name, change of phone number, change of identification documents, change of bank account number, change of tax office and other) are submitted in writing (fax, letter), with a scan to be subsequently uploaded to SharePoint. The original of the application must be sent to the headquarters so that it can be verified by designated persons who will enter the change in the systems. A scan of an application for change may also be accepted by e-mail but only if it includes a scan with a handwritten signature of the person reporting the change.

For Customers/Payers/Representatives/Clients, only changes to a contact phone and e-mail address may be accepted on the phone. The prerequisite for accepting the request is recording the call or verifying the e-mail address from which the request was sent. Any other data changes (e.g. change of the client, their residence address or of the patient, change of last name, change of phone number, change of payer or their data and other) are submitted in writing (fax, letter), with a scan to be subsequently uploaded to SharePoint. The original of the application must be sent to the headquarters so that it can be verified by designated persons who will enter the change in the systems. A scan of an application for change may also be accepted by e-mail but only if it includes a scan with a handwritten signature of the person reporting the change.

3.1.1.1. For the above requests, the requesting person may contact Promedica24 through dedicated channels used for request handling or directly – by contacting the operating departments (e.g. Human Resources, Recruitment, PCM) responsible for handling specific groups of Promedica24's partners (e.g. prospective Carers, prospective customers, prospective franchisees, Carers, customers, franchisees).

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|--------------------------------------|--|------------------------------|-------------------------|
| Promedica Care sp. z o.o. | MAIN PROCESS | Procedure version | Page No. 4 |
| Procedure No. | GDPR – Procedure for satisfying the rights of data subjects – receipt of requests | 1 | Number of pages 5 |

3.1.1.2. If the person making one of the above requests contacts a Promedica24 employee who is not duly authorised or who cannot properly verify the identity at the moment (e.g. an employee of Administration, Marketing or another back office department), the employee must instruct the requesting data subject to communicate the request to a dedicated phone number or e-mail address specified in Appendix 1.

Remember:

Remember to:

- Process every accepted request without undue delay.
- Read the recorded information (such as data of the data subject, information about their relationship with the company) out loud to allow the data subject to confirm or rectify it,
- Confirm whether the information provided is sufficient or confirm the update of the rectified information.

3.1.2. The other group consists of requests aimed at:

- a. data erasure (“right to be forgotten”),
- b. restriction of data processing,
- c. receipt of information about the recipients of personal data
- d. receipt of personal data or data transfer to another controller,
- e. objection to data processing.

3.1.2.1. For the above requests, the requesting person may contact Promedica24 through dedicated channels used for request handling or directly – by contacting the operating departments (e.g. Human Resources, Recruitment, Sales, departments in charge of customer and carer service) responsible for handling specific groups of Promedica24’s partners (e.g. prospective Carers, prospective customers, prospective franchisees, Carers, customers, franchisees).

3.1.2.2. An employee accepting a request should fill out the request form available on the intranet on <http://10.34.11.35/joomla/pl/formularze-ochrony-danych-osobowych/formularz-zgloszenia-zadania>

3.1.2.3. A filled out form will be automatically submitted to the Promedica24 DPO, who handles any subsequent processing of the request. Important note: Record every accepted request forthwith, without undue delay.

3.1.2.4. DPO commences the processing of the data subject’s request after receiving the request. (Detailed process is described in the internal DPO procedure).

Remember:

Remember to:

- Record every accepted request forthwith, without undue delay.
- Read the information in the form (such as data of the data subject, information about their relationship with the company, description of the request) out loud to allow the data subject to confirm or rectify it,
- Confirm that the request has been received,
- Inform the data subject that they will be contacted on the phone or by e-mail by the Data Protection Officer.

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|--------------------------------------|--|--|-------------------------|
| Promedica Care sp. z o.o. | MAIN PROCESS | Procedure version <u>1</u> | Page No. 5 |
| Procedure No. | GDPR – Procedure for satisfying the rights of data subjects – receipt of requests | | Number of pages 5 |

Appendix 1 – List of phone numbers and e-mail addresses dedicated to any personal data protection communications. List of offices addresses where any correspondence regarding such matters is to be sent.

| Phone numbers | |
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| Poland | +48 22 120 21 00 |
| Germany | +49 201 49 86 90 25 |
| UK | +44 20 3318 5475 |
| Romania | +40 316302347 |
| E-mail addresses | |
| Poland | daneosobowe@promedica24.pl |
| Germany | datenschutz@promedicaplus.de |
| UK | dataprotection@promedica24.co.uk |
| Romania | datepersonale@promedica24.ro |
| Bulgaria | dataprotection@promedica24.bg |
| Local offices | |
| Poland – carers | Promedica Care, Al. Jerozolimskie 94, 00-807 Warszawa, Poland |
| Poland – customers | Senior24 DE, Al. Jerozolimskie 94, 00-807 Warszawa, Poland |
| Germany – customers | Promedica24 Care Team DE, Al. Jerozolimskie 94, 00-807 Warszawa, Poland |
| Germany – franchisees | Promedica Plus Franchise GmbH, Il. Hagen 7, 45127 Essen, Germany |
| UK – customers | Promedica24 UK Ltd, Cassiobury House, 11/19 Station Road, Watford, Herts, WD17 1AP, Promedica24 (Wiltshire) Ltd, Kembrey Park Pure Offices Suite 50, Swindon, SN2 8BW, Promedica24 (West Midlands) Ltd, Westwood Way, Westwood Business Park, Ensign Business Centre, First Floor No 15, Coventry, CV4 8JA, Promedica24 (Lancashire) Ltd New Hall Hey Road, Hardmans Business Centre, Suite 1, Rawtenstall, BB4 6HH, |
| UK – franchisees | Promedica Plus UK Ltd Watford, Cassiobury House, 11/19 Station Road, Watford, Herts, WD17 1AP |
| Romania – carers | Promedica Care, Al. Jerozolimskie 94, 00-807 Warszawa, Poland |
| Bulgaria – carers | Promedica24 Care BG EOOD, Moskovska 21B, Sofia, Bulgaria |