

INFORMATION ON PROCESSING OF PERSONAL INFORMATION

In accordance with EU Regulation 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data; Organic Law 3/2018, of December 5, on data protection and digital-rights guarantees; and Law 41/2002, of November 14, regulating patient autonomy and patient rights and obligations regarding clinical information and documentation, all patients, users of the services rendered on these premises, and the general public are hereby informed of the following:

Introduction

This document contains the privacy policy of the [health centers](#) of Grupo Hospitalario Quirónsalud regarding the processing of personal data of patients receiving treatment from the aforementioned business entity and/or the individuals acting on behalf of these patients.

Patients may address any issues or questions regarding this matter to the Quirónsalud Hospital Group Data Protection Officer, who may be reached via post at Calle Zurbarán, 28, 28010 Madrid. The Data Protection Officer may also be reached via email at DPO@quironsalud.es.

Who is responsible for the processing of your data?

A) For **patients** of any of the group's care facilities, the controller of the individual's data is the company that holds ownership over the facility where the care is rendered:

Party responsible for data processing (proprietary company of the facility where you receive care) and registered office	Health center
IDCQ HOSPITALES Y SANIDAD S.L.U. Calle Zurbarán 28, Madrid (28010)	Hospital Universitario Quirónsalud Madrid Hospital Universitari General de Catalunya Hospital Ruber Juan Bravo 49 Hospital Quirónsalud Santa Justa Hospital Quirónsalud Sur Hospital Quirónsalud Tenerife Hospital Quirónsalud Toledo Hospital Quirónsalud Torreveja Hospital Quirónsalud Valencia Hospital Quirónsalud Vitoria Hospital Quirónsalud Zaragoza Hospital Ruber Internacional Hospital Quirónsalud Sagrado Corazón Hospital Quirónsalud Málaga Hospital Quirónsalud Marbella Hospital Quirónsalud Miguel Domínguez Hospital Quirónsalud Murcia Hospital Quirónsalud Ciudad Real Hospital Quirónsalud Clideba Hospital Quirónsalud Costa Adeje Hospital Quirónsalud Albacete Hospital Quirónsalud Barcelona Hospital Quirónsalud Bizkaia Hospital Quirónsalud Cáceres Hospital Quirónsalud Córdoba Hospital El Pilar - Centre Cardiovascular Sant Jordi Hospital de Día Quirónsalud Donostia Hospital de Día Quirónsalud Zaragoza Hospital de Día Quirónsalud Alcalá de Henares Hospital de Día Quirónsalud Ave María Hospital de Día Quirónsalud Talavera Clínica Quirónsalud Alcázar Instituto de Reproducción Asistida Quirónsalud Dexus Murcia Instituto de Reproducción Asistida Quirónsalud Pamplona

	<p>Instituto de Neuro-rehabilitación Quirónsalud Pontevedra Centro Médico Quirónsalud Aljarafe Centro Médico Quirónsalud Bilbao Centro Médico Quirónsalud Mérida Centro Médico Quirónsalud Fuengirola Centro Médico Quirónsalud Málaga Centro Médico Quirónsalud Manuel Siurot Centro Médico Quirónsalud Orihuela Centro Médico Quirónsalud Santa Pola Centro Médico Quirónsalud Sevilla Este Centro Médico Quirónsalud Tres Cantos Centro Médico Quirónsalud Pontevedra Centro Médico Quirónsalud Puertollano Centro Médico Teknon Centro Médico Quirónsalud Alameda Centro Médico Quirónsalud Los Remedios Centro Médico Quirónsalud Mairena Centro Médico Quirónsalud Nervión Centro Médico Quirónsalud Aribau Centro Médico Quirónsalud Almendralejo Centro Médico Quirónsalud Alicante Centro Médico Quirónsalud Parque Litoral Centro Médico Quirónsalud Costa del Sol Centro de Rehabilitación Quirónsalud Pontevedra Centro de Rehabilitación Quirónsalud Toledo Instituto Génesis de Reproducción Asistida Quirónsalud Infanta Luisa</p>
<p>INSTITUTO POLICLÍNICO SANTA TERESA S.A. Calle Londres, 2 La Coruña (15008)</p>	<p>Hospital Quirónsalud A Coruña Centro Médico Quirónsalud A Coruña Centro Médico Quirónsalud Ferrol Instituto Oftalmológico Quirónsalud A Coruña</p>
<p>CLÍNICA ESPERANZA DE TRIANA, S.A. Calle San Jacinto, 87, Seville (41010)</p>	<p>Hospital Quirónsalud Infanta Luisa Centro Médico Quirónsalud Espartinas Centro Médico Quirónsalud Condes de Bustillo</p>
<p>CLÍNICA LA LUZ, S.L. Calle del Maestro Ángel Llorca, 8, Madrid (28003)</p>	<p>Hospital La Luz</p>
<p>HOSPITAL CLINIC BALEAR, S.L. Calle Nuredduna, 4, Palma de Mallorca (07006)</p>	<p>Hospital Quirónsalud Son Veri</p>
<p>INTEGRACIÓN SANITARIA BALEAR, S.L. Carrer Santiago Russiñol, 9 Palma de Mallorca (07012)</p>	<p>Hospital Quirónsalud Palmaplanas Clínica Rotger Hospital de día Quirónsalud Playa de Muro Centro Médico Quirónsalud Sa Pobla Quirónsalud Dental Hospital Palmaplanas Quirónsalud Dental Palma Centro Quirónsalud Dental Kids Quirónsalud Dental Inca Quirónsalud Dental Manacor</p>
<p>CLINIC BALEAR, S.L. Calle Nuredduna,4, Palma de Mallorca (07006)</p>	<p>Centro Médico CB Palma Centro Médico CB Inca Centro Médico CB Manacor Centro Médico CB Palmanova Centro Médico CB Campos Centro Médico CB Sóller Centro Médico CB Arenal Centro Médico CB Ibiza Centro Médico CB Menorca (Ciudadella)</p>
<p>HOSPITAL QUIRÓN CAMPO DE GIBRALTAR, S.L. Edificio Arttysur, Avenida de los Empresarios, 19, Parque Empresarial "Las Marismas de Palmones", Los Barrios, Cádiz (11379)</p>	<p>Hospital Quirónsalud Campo de Gibraltar</p>
<p>CLÍNICA SABADELL, S.L.U. Calle Viladomat, 288, Barcelona (08029)</p>	<p>Hospital Quirónsalud del Vallès Hospital Universitari Sagrat Cor</p>
<p>USP INSTITUTO DEXEUS, S.A. Calle Zurbarán, 28, Madrid (28010)</p>	<p>Hospital Universitari Dexeus</p>
<p>FUNDACIÓN JIMÉNEZ DÍAZ UTE Avenida de los Reyes Católicos, 2, Madrid (28040)</p>	<p>Hospital Universitario Fundación Jiménez Díaz</p>
<p>UNITED SURGICAL PARTNERS MADRID, S.L. Calle Juan Bravo, 39, Madrid (28006)</p>	<p>Hospital Quirónsalud San José Hospital Ruber Juan Bravo 39</p>

CLÍNICA DEPORTIVA DE ALTO RENDIMIENTO, S.L. Calle Zurbarán, 28, Madrid (28010)	Centro Médico Ruber Internacional
POLICLÍNICA GIPUZKOA, S.A. Paseo Miramón, 174, Donostia, Guipúzcoa (20014)	Policlínica Gipuzkoa Resonancia Policlínica Gipuzkoa Irún
INSTITUTO EXTREMEÑO DE REPRODUCCIÓN ASISTIDA, S.L. Julio Cienfuego Linares, 19-21 Badajoz	IERA - Instituto Extremeño de Reproducción Asistida IERA- IERA Lisboa
HEALTH DIAGNOSTIC S.L. Calle Zurbarán 28, Madrid (28010)	Diagnóstico por imagen (part of Hospital Plató, C/Tavern núm. 82 CP 08006-Barcelona)
POLICLÍNICA SAN PEDRO, S.A. Calle Punta Umbria s/n, Huelva (21002)	Hospital Quirónsalud Huelva

(B) If we obtained your data when you subscribed to our **newsletter** or **requested information on any of the services and/or products** offered through the Quirónsalud Hospital Group webpages, the controller of your data is **IDCQ HOSPITALS AND HEALTH, S.L.U.**, with registered offices at Calle Zurbarán 28, 28010 (Madrid).

What personal information do we process and what is the source of this information?

Based on the relationship you enter into with us, we may process the following personal data:

- The identity and contact information of patients or their representatives (including signature, image, health-service card, and social security number or mutual benefit association number);
- Health-related information appearing in patient medical records;
- Personal characteristics and demographic attributes; and
- Transaction information (payments of any nature, including transfers and debits).

The data may come from the party concerned (you, the patient) or from your legal or volunteer representative and/or care professionals.

Why do we process your personal information?

Individuals responsible for data processing may process personal data for the following purposes:

1. **Delivery of health care:** your personal information is processed for the purposes of providing you the health care you need as well as to appropriately manage the health services and carry out administrative tasks required for the provision of care, as in the following examples:
 - To send appointment reminders;
 - To issue proof-of-hospital-visit documents for family members or others with ties to you and who may request such a document in adherence of applicable regulations;
 - To communicate with another health center when instructed to do so by you;
 - To process any and all incidents or claims filed by the individual using the service and/or you, the patient;
 - To administer surveys intended to gather your opinion of the care delivered to you; such surveys shall be used exclusively to improve and develop our care services and management activities; and
 - To provide the services offered via the Quirónsalud Patient Portal: personal information pertaining to patients who register as users of the [Portal](#) may be processed for the purposes of accessing and using the tool.
2. **Scientific research:** your data may be processed for scientific purposes in compliance with specific regulations governing such processing.
3. **Processing of information requests, complaints, suggestions, grievances, and the exercise of data-protection rights, etc.:** your data will be processed to fulfill the request by any means necessary, including telephone calls and/or electronic means.
4. **Compliance with legal obligations:** in order to comply with applicable legal obligations, it may be necessary to process personal information. Specifically, these obligations may be related to compliance with legislation on data protection, taxation, health, etc.

5. **Drawing up and executing the contract:** personal information is processed to manage the contractual relationship with you, the patient.
6. **Video surveillance:** certain health facilities have a video surveillance system that takes real-time footage of individuals who use the facility's services. These data are processed for the sole purpose of safety and to monitor individuals appearing on the premises.
7. **Newsletter distribution:** if you provide explicit consent, your data may be used to send you digital bulletins for the publications to which you are subscribed.
8. **Distribution of advertising materials using any means in case of additional consent:** If you so consent, we may transfer your data to [business entities that form part of the Quirónsalud Hospital Group](#) in order to inform you—via any means and for promotional and advertising purposes—as to the health- and health-care-related facilities, services, products, or events of the companies belonging to the Quirónsalud Hospital Group (under no circumstances will your data be used to send you advertising content from third parties).

The information collected will be processed for the established purposes, and under no circumstances shall data be processed toward ends that conflict with those established here. Please note that the processing of data for purposes related to scientific research or statistical measurements is not considered to be incompatible with the initial purpose. We process your data with the same degree of care and quality at all times, regardless of the channel you may choose to communicate with us (e.g. the web page of a facility, mobile apps, face-to-face, telephone, computer).

What are the legal grounds for the processing of your data?

Purpose	Basis for data processing
Provision of health-care services	Processing necessary for purposes of prevention, diagnosis, delivery of health care or treatment, as well as to manage care systems and services Processing necessary to perform a contract to which the individual is a party, and/or the legitimate interests of the controller of the data
Scientific research	Processing based on the consent of the interested party
Processing of requests	Processing based on the consent provided by the individual concerned and/or legitimate interest of the individual responsible for providing the treatment
Compliance with legal obligations	Processing necessary to fulfill a legal obligation applicable to the individual responsible for the treatment
Signing and performance of the contract	Processing necessary to perform a contract in which the individual is a party to the contract
Video surveillance	Necessary processing carried out in the public interest by the data processor as set forth in the provisions of Law 5/2014 on private security
Newsletter distribution	Processing based on the consent of the interested party
Advertisements	Processing based on the consent of the interested party

How long will we retain your information?

In general, your data will be kept only for the length of time strictly necessary for the purpose for which said data were collected.

The personal data provided, as well as data derived from the [health care](#) delivered, are kept only for the period of time appropriate to each case (in accordance with medical and legal criteria); these data will be maintained for a minimum of 10 years as of the date of each care episode, with the exception of cases in which regional and/or specific regulations stipulate that this period must be longer than that mentioned above.

After the aforementioned minimum period has elapsed, and once the care and contractual relationship has concluded, the person in charge of data processing will safeguard and anonymize the data for the legally stipulated period.

The personal data processed for purposes of **scientific research** shall be maintained, in adherence of retention criteria, for a period not to exceed five years as of the termination of the research. With regard to data processed for purposes of scientific research, the competent regional authorities may, upon request of the data controller and in accordance with established regulatory procedures, order prolonged retention of the entire set of certain data for purposes of historical, statistical, or scientific research in adherence of applicable legislation in each case.

Personal data provided for the purposes of processing information requests, complaints, suggestions, grievances, or the exercising of data-protection rights of any sort, etc., shall be retained for the period necessary to process the request. In all cases the minimum period shall be that which is legally mandated as well as that required to file grievances, exercise rights, or for the defense against such grievances or the exercise of individual rights.

Data processed to comply with **legal obligations** will be kept for the time period set forth in applicable legislation.

Data gathered to **draft and execute a contract** shall be retained for the duration of the contractual relationship as well as the period necessary to file grievances, exercise rights, or for the defense against such grievances or the exercise of individual rights. This period shall not be less than five years.

Images recorded using **video surveillance** systems will be retained for a maximum of 30 days, unless the data controller becomes aware of any facts that may be relevant to subsequent legal proceedings.

Personal data processed for the distribution of **newsletters** to which the individual has subscribed will be retained until the user withdraws his or her consent, unsubscribes from the newsletter, and/or exercises their right to oppose the retention of such data and/or requests that they be deleted.

Personal data processed for the distribution of **advertising materials** will be retained until the concerned party withdraws his or her consent and/or exercises their right to oppose the retention of such data and/or requests that they be deleted.

Who will receive my personal information?

To properly provide services, certain service providers and/or entities belonging to the Quirónsalud Hospital Group must process data on behalf of the data controller and act as designees for the processing of personal data. By way of example, such designees may be providers of medical services, diagnostic services, clinical testing, audits, entities charged with oversight of physical safety, archiving, information storage or digitization, destruction of documents, legal advisory services, or IT services.

Your personal data will not be disclosed to third parties except where there is a legal obligation, vital interest, or prior consent of the party concerned; such disclosure will only take place in the following circumstances, the recipients being those listed below:

- a) As a patient may have contracted an insurance policy in which a third party (e.g., insurance providers, mutual benefit associations, public-health authorities, or third parties in cases of civil liability insurance) may be liable for payment of the health services rendered by the facility, provided the patient makes this information known, we may disclose the patient's personal data to the aforementioned parties so they may manage, authorize, verify, and monitor payment for the care services rendered. The foregoing is legitimized by the requisite management of health-care systems and services as well as the provisions set forth in Law 50/1980 on insurance contracts.

Where a patient has insurance coverage contracted with an entity located outside the European Economic Area¹, (hereinafter, E.E.A.) where legislation concerning data protection is less stringent than that of the European Union, it may be necessary to disclose personal data internationally, provided the patient grants their express prior consent after being informed of the risks involved. We hereby inform you that these disclosures are only made to meet the needs of the patient and facilitate payment for the care services rendered; in short, information is only disclosed to manage payment and verify information with the insurer in the shortest time possible regarding services rendered for patients who have insurance coverage provided by entities based outside of the E.E.A.

Patients who decline to consent to such disclosure of their information may lead to insurer refusal of payment for the services rendered, causing them to be liable for payment given that the entities normally responsible for

¹ Member States of the European Union in addition to Iceland, Norway, and Liechtenstein

payment would, under these circumstances, be unable to verify, validate, or monitor billing on the part of the health facility for all care delivered.

- b) We also inform you that, due to legal obligations and/or in the vital interest of patients, your personal data may be disclosed to suppliers of medical equipment, prostheses, implants, and providers of ambulance services.

All information that you provide to us will be treated as confidential and in strict compliance with mandatory security measures necessary to prevent access by unauthorized third parties.

What are your rights in providing us with your data?

You may exercise your rights to require access to information, change information that is inaccurate, or request the deletion of your data when, among other reasons, the data are no longer necessary for the purposes for which they were collected. In certain circumstances, you may also request that limits be placed on the processing of your data, in which case we will only keep these data to file or defend against claims and grievances. Finally, and for reasons related to your particular situation, you can also exercise your right to object and to request a transfer of your data. Additionally, you may revoke the consent given for the processing of your data at any time.

Exercise of your rights and withdrawal of consent to process your data are free of charge, except in the cases set forth in art. 12.5 of the Regulation (EU) 679/2016, which may be exercised by completing the questionnaire [\(download here\)](#).

- A) Patients of Quirónsalud Hospital Group facilities may exercise their rights either in person at the patient answer center of the health facility where their care is rendered, or by mailing a letter to the patient answer center of the individual's care facility ([see mailing address](#)) stating that the letter is in reference to "data-protection rights" and attaching a photocopy of the individual's identity card or equivalent document and indicating the right they wish to exercise.
- B) Should the rights you wish to exercise concern any of our newsletters or requests for information regarding products and/or services offered via the group's webpages, you may exercise these rights by sending a letter to Grupo Hospitalario Quirónsalud, calle Zurbarán 28, 28010 (Madrid), indicating that the letter is in reference to "data-protection rights - newsletter/information" and attaching a photocopy of your identity card or equivalent document and indicating the right you wish to exercise.

We also inform you that you may file a grievance before the competent authority overseeing these matters, following the procedure set forth for each individual case.