Data Handling Notice for Clients

Privacy notice of UOIEA Zrt. (HIMG Clinic) for the website en.himg.clinic

Last updated: 28 October 2026

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In the course of its operations, UOIEA Zrt. (hereinafter: the Organisation) and its website en.himg.clinic (hereinafter: the Website) handle the personal data of natural persons who give their personal data to the Organisation, visitors to the Website and others who provide their personal data (hereinafter: Data Subjects). In this notice the Organisation informs Data Subjects about the data it handles about them, the principles and practices it follows when handling personal data, and the rights of Data Subjects and how they can exercise those rights. By agreeing, Data Subjects accept the contents of this notice and agree to the data processing practices described below.

1. Name of the data controller

Company name: UOIEA Zrt.
Registered office and postal address: H-1135 Budapest, Szegedi út 56. D2. lház. földszint 2.
Email: uoieazrt@gmail.com
Tax number: 27449116-2-41
Company registration number: 01-10-141567

2. Data protection laws

When handling data, the Organisation takes into account all relevant laws in force at the time. The data handling policies set out in this notice correspond to the following legislation:

- Hungarian Act LXVI of 1992 on the registration of the personal data and addresses of citizens;
- Hungarian Act CXIX of 1995 on the handling of name and address data for research and direct marketing purposes;
- Hungarian Act CVIII of 2001 on certain aspects of electronic commerce services and information society services;
- Hungarian Act XLVIII of 2008 on the basic conditions of and certain restrictions on commercial advertising (Grt.);
- Hungarian Act CXII of 2011 on the right to informational self-determination and on freedom of information (Infotv.);
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, GDPR).

3. Concepts

3.1 Personal data
Any data relating to a natural person (hereinafter: Data Subject) who can be identified, directly or indirectly, from that data – in particular the Data Subject's name, username, or one or more factors specific to their physical, physiological, mental, economic, cultural or social identity – and any conclusion that may be drawn about the Data Subject from such data.

3.2 Consent
A voluntary and definite expression of the Data Subject's wishes, based on adequate information, by which the Data Subject gives unambiguous agreement to the handling of their personal data, either in full or limited to certain operations.

3.3 Objection
A statement by the Data Subject objecting to the handling of their personal data and requesting that the data handling be stopped and the handled data be erased.

3.4 Data controller
The natural or legal person or organisation which, alone or jointly with others, determines the purpose of the data handling, makes and implements decisions about it (including the means used), or has a data processor carry it out on its behalf.

3.5 Data handling
Any operation or set of operations performed on data, regardless of the method used, in particular collection, recording, organisation, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, blocking, erasure and destruction, preventing further use of the data, taking photographs, audio or video recordings, and recording physical characteristics suitable for identifying a person (such as fingerprints or palm prints, DNA samples or iris images).

3.6 Data forwarding
Making the data available to a specified third party.

3.7 Disclosure
Making the data available to anyone.

3.8 Data erasure
Making the data unrecognisable in such a way that it can no longer be restored.

3.9 Blocking of data
Marking the data with an identifier in order to restrict its further handling, either permanently or for a specified period.

3.10 Data destruction
The complete physical destruction of the data carrier containing the data.

3.11 Data processing
The performance of technical tasks related to data handling operations, regardless of the method and means used and the place of application, provided that the technical task is performed on the data.

3.12 Data processor
The natural or legal person or organisation which processes data on the basis of a contract with the data controller, including a contract concluded by operation of law.

3.13 Third party
A natural or legal person or organisation other than the Data Subject, the data controller and the data processor.

3.14 Third country
Any country that is not a member of the European Economic Area.

3.15 Cookies and similar technologies
A cookie is a small text file that a website, or a service embedded in it, stores in the visitor's web browser and can read again on later page views. Browsers also offer similar storage, such as local storage, which keeps information on the visitor's device without sending it automatically to a server. Section 6 describes exactly which cookies and similar technologies this Website and the services embedded in it use.

4. Principles used in the course of data processing

Personal data may be handled when:

a. the Data Subject has given consent to the handling of their personal data for one or more specific purposes;
b. the data handling is necessary for the performance of a contract to which the Data Subject is a party, or in order to take steps at the request of the Data Subject;
c. the data handling is necessary to fulfil a legal obligation of the data controller;
d. the data handling is necessary to protect the vital interests of the Data Subject or of another natural person;
e. the data handling is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
f. the data handling is necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require the protection of personal data, in particular where the Data Subject is a child.

Personal data may only be handled for a specified purpose, in order to exercise a right or fulfil an obligation. At every stage of data handling, the data handling must serve its purpose, and data must be recorded and handled fairly and lawfully.

Only personal data that is essential and suitable for achieving the purpose of the data handling may be handled. Personal data may only be handled to the extent and for the duration necessary to achieve its purpose.

During data handling, the accuracy and completeness of the data must be ensured – including, where necessary for the purpose of the data handling, that the data is kept up to date – and that the Data Subject can be identified only for the time necessary for the purpose of the data handling. The Data Subject is responsible for the accuracy, completeness and validity of the data they provide. The Organisation is not responsible for the consequences of data entered incorrectly by the Data Subject, even if it could become aware of the inaccuracy. If someone enters data in the name of another person, the person entering the data is responsible for having given that person information corresponding to this notice, and for providing any proof of this that may be required.

Personal data may only be handled on the basis of prior, informed consent, unless the data handling is required by law or by the legitimate interests of the parties.

The Organisation does not publish the personal data it handles, nor does it share it with any third party other than those mentioned above (data processors), and those parties may neither retain the data nor forward it to any other person.

The data controller may forward personal data to a data processor in a third country only if the Data Subject has expressly consented to this. Data forwarding within the European Economic Area is treated as if it had taken place within Hungary.

Before the Data Subject's data is handled, the Data Subject must be informed whether the data handling is voluntary or mandatory. The Data Subject must be informed clearly and in detail of all facts relating to the handling of their data, in particular the purpose and legal basis of the data handling, the person entitled to handle the data, the duration of the data handling, and who may have access to the data.

The information must also cover the rights of the Data Subject in relation to the data handling and the available legal remedies.

The Organisation ensures the security of the data and takes the technical and organisational measures and establishes the procedures necessary to protect the data in accordance with the laws listed in section 2.

5. The legal basis and purpose of data handling

Data handling is based on the voluntary consent of the Data Subjects. This consent includes agreement to the contents of this data handling notice.

5.1 Website visitor data

Purpose of the data handling
To operate the Website, monitor its operation, prevent security incidents and investigate security incidents that have occurred.

Legal basis for the data handling
Hungarian Act CVIII of 2001 on certain aspects of electronic commerce services and information society services, section 13/A (3).

Data handled
Date and exact time of the visit, the addresses of the pages visited on the Website, the page visited before the Website, the visitor's IP address, the type of web browser and data about the operating system used.

Erasure of the data
2 years after the date of the visit.

The Website is hosted on a web server operated for the Organisation.

5.2 Services of other organisations on the Website

Some features of the Website are provided by other organisations. Depending on the visitor's choices, these organisations may receive information about the visit, in particular the visitor's IP address, and may set or read cookies or similar technologies. They are Google (Google Analytics, Google Maps, YouTube and Google Fonts). Section 6 explains in detail when each service is used, what choices the visitor has and which of these services load only with the visitor's consent or after the visitor's own action.

5.3 Personal data requested by the Organisation

Purpose of the data handling
Job advertisements for positions to be filled.

Legal basis for the data handling
The voluntary consent of the Data Subject and their legitimate interests – GDPR Article 6(1)(a) and (f).

Data handled
Curriculum vitae data (name, address, contact details, qualifications, career information and other information provided by the Data Subject).

Duration of the data handling
Until the position is filled or until erasure is requested, or, with consent, for 6 months.

Consequences if the data is not provided
The Data Subject cannot apply for the advertised positions.

Purpose of the data handling
Handling of personal data for business purposes.

Legal basis for the data handling
Due to legal requirement – GDPR Article 6(1)(f).

Data handled
Contact details of company representatives (name, address, contact details).

Duration of the data handling
Until erasure is requested.

Purpose of the data handling
Providing examinations, treatment and surgery.

Legal basis for the data handling
Legal obligation – GDPR Article 6(1)(c); legitimate interest – GDPR Article 6(1)(f); the voluntary consent of the Data Subject – GDPR Article 6(1)(a). Hungarian Act CLIV of 1997 on health care, section 136; Hungarian Act XLVII of 1997 on the handling and protection of health care and related personal data.

Data handled
Personal data of patients (name, address, telephone number, email address, outpatient data sheet; in case of surgery: anaesthesia record, nursing record, data from preliminary examinations, blood tests, radiological images, Oncotype DX).

Duration of the data handling
15 years.

Has the Data Subject's consent been requested
Yes.

Consequences if the data is not provided
The Data Subject cannot use the medical service.

Purpose of the data handling
Contact and keeping in contact.

Legal basis for the data handling
The Data Subject's voluntary consent – GDPR Article 6(1)(a).

Data handled
Contact details provided on the Website: name, email address, telephone number, message, and any other personal information provided by the Data Subject.

Duration of the data handling
2 years from receipt of the data, or until erasure is requested.

Contact by WhatsApp and Viber
Data Subjects may also contact the Organisation by WhatsApp or Viber on +36 30 214 3000. In this case the telephone number, profile name, messages and any photos sent by the Data Subject are handled for the same purpose (contact and keeping in contact), on the same legal basis and for the same period. These messages are also processed by the provider of the messaging service (WhatsApp Ireland Limited or Viber Media S.à r.l.) under its own privacy policy. Data Subjects who do not wish to use these services may contact the Organisation by telephone, by email or through the contact forms on the Website instead.

Purpose of the data handling
For examinations and surgery.

Legal basis for the data handling
Legal obligation – GDPR Article 6(1)(c); legitimate interest – GDPR Article 6(1)(f). Hungarian Act CLIV of 1997 on health care, section 136; Hungarian Act XLVII of 1997 on the handling and protection of health care and related personal data.

Data handled
Details of family contacts (name, address, contact details).

Duration of the data handling
15 years.

5.4 Contact forms on the Website

The Contact page offers two forms. Both can only be sent after the Data Subject ticks the consent box on the form.

- **Free photo assessment form:** name, email address, telephone number (optional), country or city of travel (optional), the package and areas of interest (optional), how the Data Subject heard about the clinic (optional), a message (optional), and 1 to 5 photographs of the Data Subject's head for a preliminary assessment by the clinic's doctors.
- **Callback request form:** name, telephone number and the preferred time to call (optional).

The form is sent from the Website's own server as an email to the Organisation's mailbox. The Website does not store the submitted details or photographs on the web server, and does not pass the form contents to analytics or advertising tools. To prevent automated spam, the forms use a check that runs in the visitor's browser and on the Website's own server; it does not involve any other organisation and does not set cookies.

The details sent through the forms are handled under the “Contact and keeping in contact” entry in section 5.3.

6. Cookies and similar technologies on this website

6.1 Overview

The Website distinguishes between storage that is necessary for the Website to work and optional services that are used only with your consent or after your own action:

- **Necessary storage** is always on. It only remembers your cookie choice so that the cookie banner does not appear on every page (section 6.3).
- **Analytics** (Google Analytics) is off unless you switch it on (section 6.4).
- **External media** (the Google Maps map on the Contact page) is off unless you switch it on (section 6.5).

The Website's own server does not set any cookies.

6.2 The cookie banner and your choices

On your first visit, a cookie banner appears at the bottom of the page. It offers three buttons: “Reject All”, “Accept All” and “Settings”. Rejecting is as easy as accepting: the two buttons look the same.

- **Reject All** switches off Analytics and External media.
- **Accept All** switches on Analytics and External media.
- **Settings** lets you switch Analytics and External media on or off separately, and then save your choices with “Save Choices”. Necessary storage is always on and cannot be switched off. Analytics and External media are not selected unless you select them.

Until you make a choice, Google Analytics is not loaded and the map is not shown automatically.

Your choice is kept for six months. After that, the Website asks you again. You can change or withdraw your choice at any time with the “Cookie settings” button at the bottom of every page (section 6.9).

6.3 Necessary storage

Name	Type	Purpose and content	Duration
`himg-consent`	Browser local storage on your device (not a cookie)	Remembers your cookie choice: whether you allowed Analytics and External media, and when you made the choice. It is not sent to the Website's server or to anyone else.	The choice is used for six months (182 days); after that you are asked again. The entry stays in your browser until you make a new choice or clear your browser's site data.

If your browser blocks this storage, the Website cannot remember your choice, and the cookie banner appears again on each page.

6.4 Google Analytics

With your consent, the Website uses Google Analytics, a web analytics service provided by Google, to understand how visitors use the Website, for example which pages are visited and how visitors arrive at the Website, so that the Website can be improved.

Only with consent. The Google Analytics code is loaded only after you allow Analytics, either with “Accept All” or by selecting Analytics in the settings. Before that, no Google Analytics code is loaded and no Google Analytics cookies are set. The Website does not allow Google to use this data for advertising: the advertising-related settings of Google's consent mode remain switched off even when you accept Analytics.

Data collected. When Analytics is active, your browser sends information about your visit to Google, such as the address and title of the pages you view, the page you came from, information about your browser and device, a random identifier stored in a cookie, and your IP address, which Google can use to determine your approximate location.

Cookie	Set by	Purpose	Duration
_ga	Google Analytics	Used to distinguish users.	2 years (Google's default, which the Website does not change). The expiry date may be renewed on each visit.
_ga_<ID>	Google Analytics	Used to keep the state of the current session. <ID> stands for the Website's Google Analytics identifier.	2 years (Google's default, which the Website does not change). The expiry date may be renewed on each visit.

Google Analytics sets these cookies on the highest-level domain it can, so they may also be readable on other subdomains of himg.clinic.

The six-month period in section 6.2 applies to how long your cookie choice is remembered. It is not the lifetime of the Google Analytics cookies.

Withdrawing consent. If you reject Analytics, or later switch it off under “Cookie settings”, the Website stops Google Analytics from sending further data and deletes the _ga and _ga_<ID> cookies from your browser for this Website's domain and its parent domains. Withdrawal does not affect data already sent to Google before the withdrawal.

Provider. Google's privacy information is available at policies.google.com/privacy.

6.5 Google Maps on the Contact page

The Contact page shows the clinic's location with a map from Google Maps. The map is not loaded automatically. Instead, the page first shows a short notice explaining that the map is provided by Google Maps and loads only if you choose to show it. You have two options:

- **Show Map:** the map loads on the page when you click this button. This applies to that page view only and is not saved as a setting. If you have allowed External media (with “Accept All” or in the settings), the map loads automatically when you open the Contact page.
- **Open in Google Maps:** an ordinary link that opens Google Maps in a new tab. Nothing from Google Maps is loaded on the Website when you use it. On Google's site, Google's own privacy information applies.

When the map is loaded or used, your browser connects to Google's servers. Google receives information such as your IP address and the address of the page showing the map, and may set or read cookies or similar technologies. Google decides how it uses this information under its own privacy policy: policies.google.com/privacy.

6.6 YouTube video on the Results page

The Results page shows a preview image for a short film about the clinic. The preview image is loaded from the Website's own server, so displaying it does not connect you to YouTube and does not set any YouTube cookies.

The YouTube player is loaded only when you click the preview image to play the video. The Website uses YouTube's privacy-enhanced mode (youtube-nocookie.com). Once you start the video, your browser connects to YouTube (Google), which receives information such as your IP address, and YouTube may set or read cookies or

similar technologies. The video is started only by your click; this does not depend on the External media setting. Google's privacy information applies: policies.google.com/privacy.

The “Explore More Videos on YouTube” button and the social media icons are ordinary links. They take you to the other organisation's website, where its own privacy information applies.

6.7 Google Fonts

The Website's typefaces (Inter and Playfair Display) are loaded from Google Fonts (`fonts.googleapis.com` and `fonts.gstatic.com`) when a page opens. Your browser therefore connects to Google's servers on every page, and Google receives your IP address and technical information about your browser. This happens independently of your cookie choice.

6.8 Links to messaging services and other websites

The Website contains links to WhatsApp, Viber, social media profiles and other websites. These are ordinary links: no content from these services is loaded on the Website, and they receive information only if you follow a link. Contact by WhatsApp and Viber is described in section 5.3.

6.9 Changing or withdrawing your choice

You can change or withdraw your consent at any time, as easily as you gave it:

- Click “Cookie settings” at the bottom of any page. The banner opens with the settings, showing your current choice.
- Switch Analytics or External media on or off and click “Save Choices”, or click “Reject All” to switch both off.

You can also delete cookies and site data in your browser's settings, or set your browser to block cookies. If you delete the site data, the Website will ask for your choice again on your next visit.

7. Parties who may receive data, data forwarding and data processing

The data is primarily handled by the Organisation and by contractors who have a contractual relationship with the Organisation for data processing purposes (recorded third parties and those listed in the data inventory). The Organisation's employees are also authorised to access the data; however, they may not publish it or share it with any third party. To achieve a specific purpose, the Organisation may use a data processor.

Any other forwarding of the Data Subject's personal data may take place only as required by law or with the Data Subject's consent.

8. Changes to this notice

The Organisation reserves the right to amend this data handling notice unilaterally, after giving prior notice to users. By using the service after being notified of an amendment, you accept the amended data handling notice.

9. Your rights regarding your personal data

Data Subjects may request information about the handling of their personal data, and may request the rectification of their personal data or – except where the law provides otherwise – its erasure. At the Data Subject's request, the Organisation informs the Data Subject about the data it handles about them, the purpose, legal basis and duration of the data handling, the name and address (registered office) of any data processor and its activities related to the data handling, and who has received or receives the data and for what purpose. The data controller must provide this information as soon as possible after receiving the request, but no later than

within 30 days, in a clear written form, free of charge. The information may be requested by email at uoieazrt@gmail.com, and the Data Subject will receive a reply to such an email within 8 working days.

The Data Subject may object to the handling of their personal data using the contact details given in section 12 if the Data Subject disputes the lawfulness of the data handling; in this case the Organisation must notify the Data Subject in writing of its decision on the objection. If the Data Subject disagrees with the decision, they may turn to the courts to enforce their rights.

Where the data handling is based on consent, the Data Subject may withdraw consent at any time. For cookies and similar technologies, section 6.9 describes how to do this.

10. Possibilities for legal remedy

The Data Subject may object to the handling of their personal data:

a. if the handling or forwarding of the personal data is necessary solely to fulfil a legal obligation of the data controller;
b. if the personal data is used or forwarded for direct marketing, public opinion polling or scientific research; and
c. in other cases specified by law.

The data controller examines the objection as soon as possible, but no later than within 15 days of receiving it, decides whether the objection is justified, and informs the person making the objection of its decision in writing. If the Organisation finds the Data Subject's objection justified, it stops the data handling – including further data collection and data forwarding – blocks the data, and notifies of the objection and the measures taken all those to whom it previously forwarded the personal data and who are required to take action to enforce the right to object.

If the Data Subject disagrees with the decision on the objection, or if the data controller does not respond within 15 days, the Data Subject may go to court within 30 days of receiving the decision or of the last day of the deadline for response.

11. Data controller's statement

The data controller declares that it has read and agrees to be bound by the contents of this notice, and that its data handling in connection with its services complies with the provisions of this notice.

12. Legal remedy and supervisory authority

Data Subjects have the following rights and legal remedies in connection with data handling: the Data Subject may request information from the Organisation about the handling of their personal data at its postal or email address (postal address: 1135 Budapest, Szegedi út 56.; email: uoieazrt@gmail.com). In response, the Organisation provides information about the data it handles, the purpose, legal basis and duration of the data handling, any data processors, the legal basis of their involvement, and the recipients (Infotv. section 14).

The Organisation is required to provide the information within 25 days and may refuse it only on a legal basis.

The Data Subject may submit a complaint to the Hungarian supervisory authority: Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information), 1125 Budapest, Szilágyi Erzsébet fasor 22/c; telephone: +36 (1) 391-1400; email: ugyfelszolgalat@naih.hu.