

## PRIVACY POLICY

T4T – Travel for Treatment is a holistic service of medical tourism, accessible cost-wise and user-friendly, that creates value to our clients via the integration of the best private healthcare and travel-related services. It results from a partnership between UNLIMITEDCARE – Serviços de Saúde e Assistência, S.A. (UC) and SILHUETA PROPÍCIA, LDA, a Portuguese company using the registered trademark - PHTO Travel Consulting ("PHTO").

This Privacy Policy describes how your data will be treated for the provision of the Travel 4 Treatment service, by UC, with the aim of providing customers of the latter, a health plan allowing its subscribers a greater protection in health, in accordance with the supply policy set out in the General Contractual Conditions.

### 1. DATA CONTROLLER:

UnlimitedCare - Serviços de Saúde e Assistência SA, based in Av. Marechal Craveiro Lopes, nº 6, 1700 – 284 Lisbon, Portugal with Tax Identification Number 510 367 615 owner of the trademark T4T – Travel for Treatment, herein after UC;

UC is part of the FUTURE HEALTHCARE GROUP, a Portuguese private group, founded in 2003 and based in Lisbon. For more information visit the future healthcare website [www.future-healthcare.pt](http://www.future-healthcare.pt)

### 2. DATA COLLECTION

The data collected by UC is appropriate, relevant and limited to its activities. It may be collected by telephone, e-mail or in writing, always with the consent of the data subject. Definition of **consent**: *a free, specific, informed and explicit expression of will by which the data subject (or their legal representative) agrees, by a declaration or unequivocal positive act, that personal data concerning him/her will be processed.*

In the context of client data management, the personal data collected is only transmitted to the other entities of FH GROUP and other entities in charge of providing the services covered by the contract, with the sole and exclusive purpose of carrying out and executing the services contracted by the data subject of the personal data.

### 3. CATEGORY OF PERSONAL DATA WE PROCESS

Some of the personal data that we request has a mandatory character, so without it, it will not be possible for us to provide the product and/or service. In these cases, the client will always be informed of this obligation.

For data of other beneficiaries, you should ensure that the data has been transmitted because you were authorised to do so - similarly, you should share this privacy policy with them.

How we use your data:

- Personal data (Name, identification and contact details)	In the process of subscribing the T4T Product/service When you create an account on our website (if applicable);
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- Details of the subscribed product / service (Contract N <sup>o</sup> ., type)	In the process of subscribing the product/service;
- Health Data	In the process of subscribing the product/service;
- Financial data	If required for collection, within the scope of the T4T Product/service;
- Contacts you make with us through the available means of contact (email, telephone contact, letters)	At the time you contact our services and/or are contacted by our services;
- When you make a complaint	At the time you submit a complaint to us and while it is being managed;
- Your comments and/or messages on our Social Networks	At the time you publish on our Social Networks, using your profile and in this way share your details;
- Your comments and/or messages in our Satisfaction Surveys	As the time you voluntarily and deliberately share your opinion on our products/services, the Client accepts that his assessment becomes public and grants the UC and its duly authorised partners the right to use, for commercial and advertising purposes, for all media, always guaranteeing his privacy, since the data will always be anonymised.

#### 4. DATA PROCESSING

Data processing is lawful, fair, transparent and secure and can only exist if at least one of the following situations occurs:

- The data subject has given their consent to the processing of their data for the purposes to which it is subject to and may at any time withdraw it as easily as he or she has granted it;
- The processing is necessary for the performance of a contract to which the data subject is party;
- The processing is necessary for the fulfilment of a legal obligation;
- The processing is necessary in order to defend the vital interests of the data subject or of another natural person;
- The processing is necessary for the purposes of legitimate interests pursued by the Data Controller.

Since UC deals with special categories of personal data - related to health, they are only processed in the following cases:

- If explicit consent is given for one or more specific purposes, it may be withdrawn at any time, with the same ease with which it was given; it should be noted that withdrawal of consent does not compromise the lawfulness of data processing but may condition some future service.
- If the processing is necessary for legislative purposes;
- If the processing is necessary to protect the vital interests of the data subject or natural person;
- If the processing relates to data which has been made public by the data subject;
- If the processing is necessary for legal proceedings;
- If the processing is necessary for the management of health systems and services;

- If the processing is necessary for scientific research, historical or statistical purposes.

The purpose and retention period of the data processed by UC are indicated in the following table:

Purpose	Legal Basis	Retention period
Pre-contractual and contractual relationship management, including quality control of services provided	Pre-Contractual and Contractual Diligences. Legitimate interest of the data controller to ensure the quality of the services provided. Consent of the data subject.	As long as the contractual relationship exists, or the effects thereof in respect to legal obligations arising from it
Product/service development	Legitimate interest to develop by the data controller	Minimum period necessary for the purposes for which the collection was carried out.
Marketing	With the consent of the data subject	Minimum period necessary for the purposes for which the collection was carried out.
Assessment of services provided	With the consent of the data subject	Minimum period necessary for the purposes for which the collection was carried out.
Compliance with Legal Obligations, Management Control and Anti-Fraud	Legitimate interests for controlling the activity by the data controller, including prevention of losses due to fraud. For the statement, exercise or defence of rights in judicial proceedings.	Legal timeframe applicable at each time for each of the Legal Obligations to be fulfilled. Until the expiry of the limitation or time period for the exercise of rights

## 5. SECURITY IN DATA PROCESSING

UC applies all appropriate technical and organisational measures for the protection and security of personal data, ensuring the confidentiality, integrity, availability and resilience of processing systems and the ability to access data in a timely manner in the event of a physical or technical accident. To ensure the security of processing, in addition to pseudonymisation and encryption of personal data, the UC has processes for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures.

## 6. RIGHTS OF THE DATA SUBJECT

The data subject has several rights, in particular:

- Have **access** to your data through a clear and simple language. These may be provided in writing, orally or by electronic means provided that the data subject's identity is proven;
- **Rectification** of data concerning yourself;
- **Erasure** of data without undue delay where the data is no longer required for the purpose of collection, the data subject withdraws consent, the data has been processed unlawfully or has to be erased under a legal obligation - (**'right to be forgotten'**);
- **Data portability**, i.e. receiving the personal data you have given to a controller or the data being transmitted directly between controllers;
- **Limitation of processing of** your data, at any time;
- **Object to the processing** of your data, unless the controller has legitimate reasons that override the interests or rights of the data subject or for legal effects;
- **To lodge a complaint** to Comissão Nacional de Proteção de Dados (Portuguese Data Protection Supervisory Authority);

You may exercise any of the right above by contacting UC, through the contacts listed in section 12.

## 7. SHARING AND TRANSFER INFORMATION:

We share information with our affiliated organizations and parent company – within FH Group.

For the purpose of enabling the Client to join the T4T service in accordance with the offer policy set out in the General Contractual Conditions, UC will have to share personal data to:

- a) Medical providers – in order for them to set out the initial medical consultation and to guarantee the eligibility of the T4T Services.;
- b) To the other members of the T4T consortium, namely to PHTO. In this case we will only share contact details, in order for PHTO conclude the necessary acts regarding travel and accommodation of the Clients. Under no circumstances will **Health Data** be transmitted by UC to PHTO. We can share the health data to the healthcare providers, with your express consent.

Thus, pursuant to the terms of the legislation in force, the Client acknowledges and accepts that the Partners - UC and PHTO shall communicate to each other, as Data Controllers, the data indicated above, which shall be processed strictly to the extent that they are necessary for the execution for the provision of T4T Services and its management

PHTO shall act as the entity responsible for and independent of the UC, for the processing of the aforementioned personal data to have full information on how PHTO treats your personal data, please consult the PHTO website [https://www.travelconsulting.pt/images/politica\\_privacidade.pdf](https://www.travelconsulting.pt/images/politica_privacidade.pdf) or contact PHTO at Rua Hermano Neves, N<sup>o</sup> 18, Piso 3, Sala 7 1600 - 477 Lisbon; You can also contact PHTO at these contact addresses for information about your rights or to lodge a complaint about the way your data is handled, as

well as to lodge a complaint with the CNPD- Comissão Nacional de Proteção de Dados which contact details can be found at [www.cnpd.pt](http://www.cnpd.pt).

We may also share information with third parties who perform services for us. In this case the relationship is entered into a contract and UC ensures that the subcontracting entities have sufficient conditions to carry out technical and organisational measures for data processing and to ensure the protection of the rights of the data subjects. We may share information with payment processors. We will share information if we have to in order to comply with the law.

## **8. TRANSFER OF DATA TO THIRD COUNTRIES**

UC store the personal data in European Union. If, for some reasons UC will be entitled to store or transfer personal data, outside the European Economic Area, we In such cases, we inform you that we transfer your data with adequate guarantees and ensuring the security of your data at all times, using the most appropriate international data transfer data, such as, for example, those provided for in the Standard Contractual Clauses, and, where applicable, additional measures.

## **9. DATA PROTECTION OFFICER**

- For data protection purposes, a Data Protection Officer (DPO) was appointed by UC who should be contacted whenever necessary at one of the following addresses: [protecaodados@future-healthcare.eu](mailto:protecaodados@future-healthcare.eu)  
Avenida Marechal Craveiro Lopes nº6 - Campo Grande 1700-284 Lisboa

## **10. COOKIES**

UC uses cookies on its websites as a tool for a better user experience. For more information about their use on websites please see the [Cookie Policy](#).

## **11. MODIFICATIONS TO THE PERSONAL DATA PROTECTION POLICY**

The Data Protection Policy may be modified at any time without prior notice. The amended Policy comes into force as soon as it is published on the website.

## **12. CONTACTS**

If you have any questions on this privacy policy please do not hesitate to contact one of the following addresses:

**Address:** Av. Marechal Craveiro Lopes, n.º 6 - Campo Grande, 1700-284 Lisboa

**Mail:** [protecaodados@future-healthcare.eu](mailto:protecaodados@future-healthcare.eu) [mailto: info@future-healthcare.eu](mailto:info@future-healthcare.eu)

**Telephone:** **+351 21 040 24 27** (Local call rate for Portugal) with office hours from Monday to Friday, from 9am to 7pm (NY time);

*Updated on 06.06.2022*