

# Personal Data Collection and Processing Policy

Medical Clinic: United Medical Clinic Lisboa (UMCL LDA)

Effective Date: April 1, 2023

Last Updated: December 3, 2024

## Section 1: General Information

- Full Name: United Medical Clinic Lisboa (UMCL LDA)
- Address: Avenida Defensores de Chaves 73B, 1000-114, Lisboa.
- Contact Information: admin@umedclinic.pt, +351 300 502 822
- Data Protection Officer: Not yet appointed (contact information will be updated upon appointment).

The clinic commits to complying with the General Data Protection Regulation (GDPR) and Portuguese data protection laws.

## Section 2: Purposes of Data Processing

The clinic processes personal data exclusively for the following purposes:

### Provision of Medical Services:

- Diagnosis, treatment, and prevention of diseases.
- Maintenance of medical records and health history.
- Prescription of medications, vaccination, and health monitoring.

### Administrative Management:

- Patient registration and appointment scheduling.
- Record-keeping, billing, and interaction with insurance companies.
- Appointment reminders and notifications about test results.

### Legal and Regulatory Obligations:

- Reporting to health regulatory bodies.
- Compliance with national healthcare reporting programs.

### Protection of Vital Interests:

- Emergency response.
- Contacting relatives in life-threatening situations.

### Data Security and Internal Order:

- Access control to medical records.
- Use of video surveillance (if applicable).

### Scientific Research and Education (Anonymized Data):

- Use of anonymized data for training and analysis.

### Telemedicine Services (if applicable):

- Conducting remote consultations.

### Marketing (with patient consent):

- Notifications about new clinic services.

## Section 3: Categories of Processed Data

### General Data:

- Full name, date of birth, gender.
- Address, contact information (phone, email).
- Identification documents (passport, ID).

**Sensitive Data:**

- Health history, diagnoses, test results, prescribed treatments.
- Chronic illnesses, pregnancy, vaccination details.
- Allergies, prescriptions, surgical interventions.

**Administrative Data:**

- Patient ID in the system.
- Insurance data (policy number, insurance provider).

**Payment Information:**

- Payment history, financial documents.

**Additional Data with Patient Consent:**

- Photos, videos for medical documentation.
- Participation in scientific research.

## Section 4: Data Sources

- Patients: Data provided during registration, verbally, or via digital platforms.
- Medical Institutions: Referrals from doctors, labs, or other clinics.
- Insurance Companies: Information on policy and coverage.
- Government Authorities: Data from registries and mandatory reporting.
- Patient's Family: Emergency contacts.
- Automated Systems: Telemedicine and data tracking systems.

## Section 5: Data Storage

**Storage Locations:**

- Electronic data: Encrypted servers in the EU, GDPR-compliant cloud storage.
- Paper archives: Locked facilities with restricted access.

**Retention Periods:**

- Medical records: At least 10 years after treatment ends, per Portuguese law.
- Financial records: 5 years (for tax compliance).
- Video surveillance data: Up to 30 days, if used.

**Protection Measures:**

- Data encryption, access control, cybersecurity tools.

## Section 6: Legal Basis for Data Processing

**Patient Consent:**

- For processing sensitive categories of data.
- For using data in marketing or research.
- Contract Fulfillment: Provision of medical services.
- Legal Obligations: Compliance with national laws.

## Section 7: Information Systems in Use

The clinic uses the certified medical information system iMed for managing, storing, and processing patient data.

**Features of the iMed System:****Usage Purposes:**

- Maintenance of electronic medical records.

- Managing patient appointments.
- Processing diagnostic data, laboratory results, and prescriptions.
- Storing health histories.
- Organizing telemedicine services (if applicable).
- Analyzing data for internal improvement of medical services.

#### **Data Security:**

- Encryption: Data is encrypted during storage and transmission.
- Access Control: Only authorized personnel have role-based access.
- Logging: A complete user action log is maintained for data tracking.
- Backup: Data is regularly backed up on GDPR-compliant servers within the European Economic Area (EEA).

#### **Patient Rights:**

- iMed supports patient requests for access, correction, deletion (where legally justified), and processing restrictions.
- Patients can request their medical documentation in a structured format.

#### **Data Retention:**

- Medical data is stored on secure servers in the EU, in compliance with GDPR.
- Paper documentation is stored in protected clinic facilities.

#### **Partnership Obligations:**

- The clinic has a data processing agreement with iMed, ensuring GDPR compliance and detailing responsibilities for data breach notification and protective measures.

## **Section 8: Incident Response**

In case of a data breach involving iMed:

- Immediate notification to the iMed provider.
- Notification to CNPD within 72 hours.
- Informing affected individuals if there is a high risk to their rights and freedoms.

## **Section 9: Patient Rights**

Patients have the right to:

- Access their data.
- Request correction of inaccuracies.
- Request data deletion (where legally permissible).
- Restrict data processing.
- File complaints with CNPD.

For exercising these rights, patients can contact: [admin@umedclinic.pt](mailto:admin@umedclinic.pt)

## **Section 10: Data Sharing with Third Parties**

#### **Recipients:**

- Insurance companies (policy processing).
- Government authorities (for reporting).
- Laboratories and diagnostic centers.

#### **Protection Measures:**

- Data processing agreements.
- Verification of GDPR compliance.

## **Section 11: Incident Response**

- Notify CNPD and affected parties within 72 hours.
- Conduct an internal investigation.
- Implement corrective measures to prevent recurrence.