

PRIVACY POLICY

**Medicare Biztosító Zrt.
(Medicare Insurance Private Ltd.)**

Effective from: 1st June 2026

Tartalom

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The present privacy policy sets forth the guidelines governing **Medicare Biztosító Zrt.**'s (hereinafter: the "Insurer") processing of personal data. Below, you will find information on what personal data the Insurer processes, for what purposes and on what legal basis, for how long, as well as who may become aware of and who may access the personal data processed by the Insurer.

In addition to the above, you will find detailed information below regarding your rights in connection with data processing and how to exercise them.

If you have any questions or comments regarding data processing or the information contained in this policy, please send them to dataprotection@medicarebiztosito.hu.

The Insurer may amend this privacy, particularly in the event of the introduction of new data processing activities or changes to existing data processing activities, and will primarily notify its customers and other affected individuals of such changes on its website.

By expressing your intention to use health insurance services, or when submitting the insured's statement and the enrollment statement, you acknowledge that you have read and accepted this privacy policy.

1. How does the Insurer manage personal data?

The Insurer processes and protects information regarding natural persons (e.g., personal identification data, contact information, health data, etc.)—that is, personal data—that comes to its attention in the course of its business activities, in accordance with the Regulation (EU) 2016/679 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 – GDPR) and the relevant Hungarian data protection laws, in its capacity as a data controller.

Name:	Medicare Biztosító Zrt. (Medicare Insurance Private Ltd.)
Registered seat and mailing address:	H-1134 Budapest, Váci út 29-31.
E-mail address:	dataprotection@medicarebiztosito.hu
Website address:	www.medicarebiztosito.hu

The definition of data management related to personal data includes any operation or set of operations which is performed on personal data, such as recording, storage, consultation, use, disclosure, transmission, erasure or destruction. In course of the management of the personal data the Insurer takes the necessary and appropriate measures to prevent unauthorized access to the personal data and the unauthorized use thereof. In particular, it ensures that its electronic

systems are protected against unauthorized access (e.g., through the use of firewalls and secure authentication).

The personal data managed by the Insurer may be accessed by its employees and contributors, to the extent necessary to fulfil their tasks and to the provision of services to you, subject to confidentiality obligation. In addition, the Insurer may transfer the data managed by the Insurer to third parties, e.g. to authorities, in order to fulfil its legal obligations. Data may be transferred in order to provide services to you (e.g. in case of the use of external service providers), as well as if the Insurer employs any data processor for certain data management operations (e.g. data storage, systematization), which data processor shall act on behalf and according to the instructions of the Insurer. Also in case of the latter data management the Insurer ensures that the personal data are transferred only to those data processors which provide appropriate guarantees for ensuring the security of the data management and your personal data.

In drafting and applying this privacy policy, the Insurer has acted in accordance with Act XLVII of 1997 on the Processing and Protection of Health and Related Personal Data, Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information, as well as the GDPR, and complies with all provisions thereof.

The Insurer does not transfer personal data to countries outside the EU and does not use the data for automated decision-making.

2. Which personal data are managed by the Insurer?

Below you will find general information about the Insurer's data processing activities for various purposes. If you would like to receive personalized information—for example, regarding exactly which recipients the Insurer has disclosed your personal data to and when—please send your request to dataprotection@medicarebiztosito.hu.

Please note that in cases where data processing is based on consent, you have the right to withdraw your consent to such processing at any time. Withdrawing your consent to data processing does not affect the lawfulness of any data processing carried out on the basis of your consent prior to the withdrawal. You may submit your statement of withdrawal

- for newsletters, by clicking the unsubscribe link in the newsletter or by sending an email to dataprotection@medicarebiztosito.hu,
- by email sent to dataprotection@medicarebiztosito.hu,
- by mail to the following address: 1134 Budapest, Váci út 29-31.

A. Data processing related to the provision of health insurance services and the fulfillment of health insurance contracts

Purpose of data processing	Providing health insurance services; entering into, amending, and terminating health insurance contracts; fulfilling obligations under the contract; enforcing rights and any claims that may arise; defending against claims; ensuring compliance with laws
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	and regulations and verifying such compliance; and communication.
Legal basis for data processing	Performance of a health insurance contract [GDPR Article 6. (1) b)], Insurer's legitimate interest in the assertion of a claim [GDPR Article 6. (1) f)], Compliance with legal obligations [GDPR Article 6. (1) c)]
Scope of personal data processed	In the case of group health insurance, the following information regarding the Insurer's clients' employees and agents, as insured persons: - Personal identification information (name, birth name, place and date of birth, mother's name, Social Security number, gender, language) - Medicare registration number (MRN) - contact information (address, phone number, email address) - employer's name; in some cases, job title - name of health insurance package, effective date of risk bearing - bank account number, if applying for an individual premium paying package In the event of an extension of group health insurance, the following information regarding the insured person's family members: - Personal identification information (name, birth name, place and date of birth, mother's name, Social Security number, language) - Medicare registration number (MRN) - Contact information (address, phone number, email address) - Name of health insurance package, effective date of risk bearing For individual health insurance, the Policyholder's information is as follows: - personal identification data (name, birth name, place and date of birth, mother's name, social security number, language) - contact information (address, phone number, email address) - the Subscription ID and Transaction ID used by SimplePay for recurring payments

	For individual health insurance, the following information about the Insured: - Personal identification information (name, birth name, place and date of birth, mother's name, Social Security number, language) - Medicare registration number (MRN) - Contact information (address, phone number, email address) - Name of health insurance package, effective date of risk bearing
Duration of data processing; Deletion	The Insurer processes personal data as insurance secrets for the duration of the insurance relationship and for 5 years following the termination of the health insurance policy; furthermore, the Insurer processes the personal data listed on the accounting document and its attachments for 8 years, in accordance with the provisions of the Accounting Act. After the expiration of the above time limits, the data will be deleted or destroyed.
Categories of recipients, Data transfer	The Insurer will disclose the personal data of the insured persons and/or their employers—or, in the case of individual health insurance, the personal data provided by the Policyholder—as well as other personal data related to health insurance services to the following recipients: - to its service organizer [Medicare Zrt. (headquarters: 1134 Budapest, Váci út 29-31, company registration number: 01-10-042382)], for the purpose of organizing healthcare and providing medical services; - to insurance brokers, acting as data processors, for the purpose of fulfilling the health insurance contract; - to the authorities and courts specified in Act LXXXVIII of 2014 on Insurance Activities, upon their official request or summons, in accordance with the law; - to the data processor providing billing system operations, pursuant to a data processing and outsourcing agreement (AppVision Kft.; registered office: 1087 Budapest, Könyves Kálmán Krt. 48-52, 1st floor, E/121.); - to its data processor that provides a document management and administrative system, pursuant to a data processing and outsourcing agreement (Gemma Rendszerház Kft.; registered office: 1211 Budapest, Kiss János altábornagy u. 59, 2nd floor, apt. 7) - to its data processor providing server services, pursuant to a data processing and outsourcing agreement (One Magyarország Zrt.; registered office: 1112 Budapest, Boldizsár utca 2.);

Consequences of failure to report data	The provision of data is necessary for the fulfillment of the health insurance contract and the provision of services; therefore, if the data is not provided, health insurance services cannot be provided.
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B. Processing of health data

What is health data? Health data includes any data relating to a natural person's physical or mental health, as well as any data generated in connection with health services the person has received regarding their health status.

Purpose of data processing	Concluding, amending, terminating, and fulfilling health insurance contracts; specifically, in the case of group health insurance services, assessing claims, verifying and certifying coverage, settling claims, and processing payments for the Insurer's clients' employees and agents as insured persons, as well as for the insured persons under individual insurance contracts. Furthermore, the objective is to pursue claims and defend against claims, as well as to verify the granting of consent.
Legal basis for data processing	Your consent as the data subject, which you provide to the Insurer by signing the "Insured's Statement" form [GDPR Article 6. (1) a), Article 9. (2) a) , h)].
Scope of personal data processed	Health information provided by the insured, as well as health information generated during the provision of health care and made available to the Insurer by the relevant health care provider.
Duration of data processing; Deletion	The Insurer retains health data for 5 years from the date of the insured event, after which it deletes or destroys such data.
Categories of recipients, Data transfer	The Insurer discloses health data to the following recipients: - to Medicare Zrt., to the extent necessary for the provision of health care services - to the authorities and courts specified in Act LXXXVIII of 2014 on Insurance Activities, upon their official request or summons, in accordance with the law; - to its data processor that provides a document management and administrative system, pursuant to a data processing and outsourcing agreement (Gemma Rendszerház Kft.; registered office: 1211 Budapest, Kiss János altábornagy u. 59, 2nd floor, apt. 7) - to its data processor providing server services, pursuant to a data processing and outsourcing agreement (One Magyarország Zrt.; registered office: 1112 Budapest, Boldizsár utca 2.).

	Furthermore, Medicare Zrt. will provide the Insurer with the health data it has obtained in connection with the insurance service and that is necessary for the assessment of a claim, for the purpose of assessing that claim.
Consequences of failure to report data	The provision of data is necessary for the fulfillment of the health insurance contract, the provision of services, settlement, and the determination of coverage; therefore, health insurance services cannot be provided if the data is not submitted.

C. Data processing related to complaints

Purpose of data processing	Handling complaints, investigating the circumstances of the case in question, and addressing the complaint; as well as verifying that consent has been granted.
Legal basis for data processing	Compliance with the legal obligation regarding complaint handling set forth in Act LXXXVIII of 2014 on Insurance Activities. [GDPR Article 6. (1) c)]; The consent of the affected individual, which is provided to the Insurer by filing the complaint [GDPR Article 6. (1) a) , Article 9. (2) a)], especially if the person who filed the complaint was not the one who received the health care service; Performance of a health insurance contract [GDPR Article 6. (1) b)]
Scope of personal data processed	The personal identification information provided in the complaint of the complainant or the person who received the health care service that is the subject of the complaint (typically: name, email address, residential address), as well as the personal data—and, where applicable, health data—contained in the complaint.
Duration of data processing; Deletion	Pursuant to Act LXXXVIII of 2014 on Insurance Activities, the duration of data processing is 5 years from the date the complaint is closed, after which the data will be deleted or destroyed.
Categories of recipients, Data transfer	The Insurer may transmit personal data—including health data, where applicable—related to complaints to the following recipients. - to the service organizer and to the data processor (Medicare Zrt.)—which actually performs the complaint-handling activity under an outsourcing and data processing agreement—for the purpose of investigating the circumstances of the healthcare service subject to the complaint and the complaint regarding the insurance service; - for insurance brokers, based on the mandate agreement existing between the insurance broker and the Insurer's client; - to the authorities and courts specified in Act LXXXVIII of 2014 on Insurance Activities, upon their official request or summons, in accordance with the law;

	- in the event of claims settlement, to the data processor operating the billing system, based on a data processing and outsourcing agreement (AppVision Kft.; registered office: 1087 Budapest, Könyves Kálmán Krt. 48-52, 1st floor, E/121); - to its data processor that provides a document management and administrative system, pursuant to a data processing and outsourcing agreement (Gemma Rendszerház Kft.; registered office: 1211 Budapest, Kiss János altábornagy u. 59, 2nd floor, apt. 7); - to its data processor providing server services, pursuant to a data processing and outsourcing agreement (One Magyarország Zrt.; registered office: 1112 Budapest, Boldizsár utca 2.); - to Jira Service Management (Atlassian B.V., registered office: Singel 236, 1016 AB, Amsterdam, Netherlands), the operator of the online complaint submission and registration interface, under a data processing agreement.
Consequences of failure to report data	All data relevant to the complaint is required to handle the complaint and investigate the circumstances. Failure to provide the necessary data, or providing incomplete data, renders it impossible—or prevents the proper execution—of the investigation into the complaint.

D. Recording of telephone conversations

The Insurer records telephone calls made through its customer service department as follows.

Purpose of data processing	The general purpose of recording telephone conversations is to provide evidence of what was said during the conversation. In the case of complaints made by telephone, the aim is to accurately record the details of the complaint. Furthermore, the aim is to respond to telephone enquiries, to continuously improve the quality of the Insurer's services, and to verify that consent has been given.
Legal basis for data processing	In the case of a complaint made by telephone, compliance with the legal obligation relating to the handling of complaints as set out in Act LXXXVIII of 2014 on Insurance Activities. [GDPR Article 6. (1)c)]; In the case of other reports, comments or enquiries made by telephone that do not constitute complaints, the legal basis for data processing is your consent as the data subject, which you give by continuing the call after being informed that the call is being recorded. [GDPR Article 6. (1) a)];

	Furthermore, the Insurer's legitimate interest in quality assurance and the enforcement of claims constitutes a legal basis [GDPR Article 6. (1) f)]
Scope of personal data processed	Personal data and health data disclosed during a telephone conversation initiated to and conducted via the Insurer's current published official telephone number, as well as the time and duration of the call, the caller's telephone number and the voice of the data subject.
Duration of data processing; Deletion	The duration of data processing is 5 years from the date the complaint is closed in the case of complaints made by telephone; in other cases, it corresponds to the limitation period (the deadline for asserting a claim – 5 years from the end of the call), after which the data will be erased or destroyed.
Categories of recipients, Data transfer	- complaints handling staff; - to its data processor providing server services, pursuant to a data processing and outsourcing agreement (One Magyarország Zrt.; registered office: 1112 Budapest, Boldizsár utca 2.); - to the authorities and courts specified in Act LXXXVIII of 2014 on Insurance Activities, upon their official request or summons, in accordance with the law
Consequences of failure to report data	In the case of a complaint made by telephone, if the information provided is incomplete or missing, the complaint cannot be investigated, or cannot be investigated properly. In other cases, without the provision of personal data, the data subject's request cannot be fulfilled, and no response can be given to their enquiry concerning their personal circumstances.

E. Data processing in connection with other enquiries, customer satisfaction surveys and maintaining contact

Purpose of data processing	The purpose of data processing is to maintain contact; where applicable, to fulfil a contract concluded with the Insurer, to provide services, to collect and evaluate feedback on the quality of services provided, and thereby to improve the standard of service. In other cases, it is to respond to reports, enquiries and questions; and to verify that consent has been given.
Legal basis for data processing	In the case of persons designated as contact persons in the contract by the Insurer's contractual partners, the legal basis for data processing is the legitimate interest of the Insurer and

	its contractual partner in the performance of the contract [GDPR Article 6. (1) f]); In the case of reports, enquiries or questions that do not constitute a complaint, your consent as the data subject is given to the Insurer by submitting the report, enquiry or question [GDPR Article 6. (1) a)]; Where a customer satisfaction questionnaire is sent in relation to a service already provided by the Insurer, and a request for feedback is made, the processing of data is compatible with the original purpose for which the personal data was originally collected; in such cases, there is no need for a separate legal basis other than the one that permitted the collection of the personal data (processing of personal data for purposes other than the original purpose for which it was collected; further processing).
Scope of personal data processed	The person designated as the contact person in the contract, as well as any person who contacts the Insurer with a notification, enquiry, question or request: - name, - (work) telephone number, - (work) e-mail address, - further personal data contained in enquiries or notifications. When a customer satisfaction questionnaire is sent in relation to a service already provided by the Insurer or a request for feedback is sent, your name and email address.
Duration of data processing; Deletion	With regard to the personal data of the contractual contact person, data processing continues for the duration of the relevant contract and, following its termination, until the expiry of the limitation period (the time limit for bringing a claim – 5 years). In the case of reports, enquiries or questions that do not constitute complaints, data processing shall continue for 1 year following receipt of the enquiry, after which the data shall be erased or destroyed. In the case of the return of a customer satisfaction questionnaire or the submission of a rating, the data will be retained for 1 year, after which it will be deleted or destroyed.
Categories of recipients, Data transfer	The Insurer will disclose personal data to the following recipients: - to the authorities and courts specified in Act LXXXVIII of 2014 on Insurance Activities, upon their official request or summons, in accordance with the law; - to its data processor that provides a document management and administrative system, pursuant to a data

	processing and outsourcing agreement (Gemma Rendszerház Kft.; registered office: 1211 Budapest, Kiss János altábornagy u. 59, 2nd floor, apt. 7) - to its data processor providing server services, pursuant to a data processing and outsourcing agreement (One Magyarország Zrt.; registered office: 1112 Budapest, Boldizsár utca 2.)
Consequences of failure to report data	In the absence of contact details, it is impossible to maintain contact, and enquiries cannot be answered..

F. Newsletter service, enquiries regarding direct marketing

Please be advised that we may use the electronic contact details obtained whilst you are using the services of Medicare Biztosító Zrt. for the purpose of direct marketing relating to similar services offered by Medicare Biztosító Zrt. You have the right to object, free of charge, to the use of your electronic contact details for this purpose by sending an email to dataprotection@medicarebiztosito.hu.

Purpose of data processing	To promote the Insurer's services, to publish news and information relating to them, to encourage the use of the services, and to generate business directly; and to provide evidence of consent.
Legal basis for data processing	Your consent as a data subject, which you give by subscribing to the newsletter [GDPR Article 6. (1) a)], furthermore, the Insurer's legitimate interest in direct marketing pursuant to Article 13 (2) of Directive 2002/58/EC of the European Parliament and of the Council.
Scope of personal data processed	The following data provided by you, as the data subject: - name - e-mail address. If you subscribe to our newsletter service, in addition to the information set out above, we will store and process the following data relating to you: - the domain name of the website where you signed up - the date and time of subscribe - IP address
Duration of data processing; Deletion	The Insurer will process personal data until an objection is raised against the processing or consent is withdrawn..
Categories of recipients, Data transfer	The data required to provide the newsletter service is transferred to Sinch [Mailgun], acting as a data processor, on the basis of a data processing agreement. Information regarding data processing is available via the contact details below: https://sinch.com/legal/terms-and-conditions/other-sinch-terms-conditions/data-protection-agreement/ .

	Personal data may also be disclosed to authorities and courts specified by law, in response to their official requests or summonses, or as required by law.
Consequences of failure to report data	If data is not provided, the newsletter service cannot be provided.

G. Processing of data relating to job applicants

Purpose of data processing	Filling the advertised vacancy, recruitment, selection of staff, assessment of applications; and to provide evidence of consent.
Legal basis for data processing	The legal basis for data processing is your consent as an applicant, which you provide to the Insurer by submitting your application [GDPR Article 6. (1) a)]
Scope of personal data processed	In the case of applicants, data received directly from the applicant or via a job portal: - name; - contact details (telephone number, email address); - any personal data provided by the applicant in their CV or in connection with their application.
Duration of data processing; Deletion	If you are not selected for the position you have applied for, or if you decide to withdraw your application before the application has been assessed, the purpose of data processing will cease and we will delete your personal data and CV without delay. Should you be selected for the position, we will subsequently proceed in accordance with the rules governing the processing of our employees' personal data, about which we will provide you with detailed information upon the commencement of your employment.
Categories of recipients, Data transfer	Staff members involved in the insurer's selection process.
Consequences of failure to report data	In the case of applicants, incomplete information does not allow for a successful assessment of the application.

3. What rights can be exercised in relation to the processing of personal data?

You have the right to:

- information, access to your personal data, request copies
- the rectification of your personal data,
- withdraw your consent granted to the data management,
- the erasure of your personal data, i.e. 'to be forgotten',
- object to the data management,
- restrict the data management,

- data portability, and
- legal remedy.

a) Right to information

In addition to the information detailed in Section 2, using the contact details provided in Section 1, you may request specific information related to you from the Insurer regarding whether the Insurer manages any of your personal data, for which purpose and on what legal basis, for how long, as well as you may request information as to how the Insurer obtained your personal data, whether the Insurer transferred or provided access to the personal data to any third party, and if yes, then to whom, when, for what purpose. You may also request concrete information on your rights related to the data management. The Insurer provides the information for free, however, where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, then – using the opportunity provided by the applicable law – the Insurer may (taking into account the administrative costs of providing the information or communication or taking the action requested) charge a reasonable fee or may refuse to act on the request for information. You may request to be provided with the copy made of your personal data, in electronic or other (in particular paper) format, as consideration of which – using the opportunity provided by the applicable law – the Insurer may charge a reasonable fee (based on administrative costs). The Insurer will fulfil with your request for information while respecting the rights of others (in particular the trade secret and the right to the protection of intellectual property).

b) Right to rectification

If you become aware that any of your personal data (therefore in particular e.g. contact data, e-mail address, telephone number) managed by the Insurer and stored in its system is incorrect (e.g. due to typo) or incomplete, then upon your request sent to the contact details specified in Section 1, the Insurer will amend your incomplete personal data in its systems, and will rectify your incorrect personal data. In addition, the Insurer will also notify all those third parties of the rectification to whom the Insurer transferred your personal data, except if it is impossible or would require disproportionate effort.

c) Withdrawal of the consent granted to the data management; right to erasure, 'to be forgotten'

You may withdraw your consent to the data management granted at any time, which however does not affect the lawfulness of the data management preceding the withdrawal.

If you withdraw your consent to the data management granted and

- there is no other legal basis for the data management, or
- the purpose of the data management ceased, or
- if the data management is unlawful, or
- the data shall be erased under the law,

then upon your request sent to the contact details specified in Section 1, the Insurer will erase your personal data from its systems or will destruct your personal data permanently. In

addition, the Insurer will also notify all those third parties of the erasure to whom the Insurer transferred your personal data, except if it is impossible or would require disproportionate effort.

d) Right to object

If the data management is based on the legitimate interest of the Insurer or any other third party, then you have the right to object to the data management through the contact details specified in Section 1, in which case the Insurer will no longer manage your personal data, except if the data management is justified by any compelling legitimate ground.

e) Restriction of the data management

Through the contact details specified in Section 1, you may request the restriction of the data management related to your personal data, in which case the Insurer may only store your personal data without using those or carrying out further data management operations (e.g. transfer, erasure); the latter may occurred during the restriction only if you granted your consent thereto, if those are necessary for exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. In addition, the Insurer will also notify all those third parties of the restriction to whom the Insurer transferred your personal data, except if it is impossible or would require disproportionate effort..

You may request the restriction of the data management if,

- with regard of your opinion the accuracy of your personal data, and you do not want your personal data to be used by Medicare until those are rectified, or
- in your opinion, the data management is unlawful, or
- the purpose of the data management carried out by Medicare ceased, however, you do not want your data to be erased, because you need those for e.g. lodging, defending or enforcing your legal claim.

You may request the restriction simultaneously with the objection to the data management based on the legitimate interest of Medicare or any other third party, in which case the restriction shall apply until the assessment of the request for objection at the latest.

f) Data portability

If the data management is based on your consent, or if data management is necessary for the fulfilment of the contract concluded with your, or if the data management is carried out by automated means, then through the contact details specified in Section 1, you may request that solely those personal data which you provided to the Insurer and which are related to you be transferred in a structured, commonly used and machine-readable format to you or another data controller specified by you, and in case of data concerning health, subject release from medical confidentiality. The Insurer will comply with your request for information while respecting the rights of others (in particular the trade secret and the right to the protection of intellectual property).

4. How can you enforce the rights related to data management?

You may submit your inquiry or request for exercising your rights related to the data management detailed above to the contact details specified in Section 1. Please provide at least two of your personal data in your request, with which the Insurer can identify you (e.g. name and telephone number, name and e-mail address). You may make your request or observation verbally as well, via the telephone number specified in Section 1, however, the Insurer will in any case reply or provide information in writing (primarily in the form chosen by you, or in the absence thereof, subject to the discretion of the Insurer, electronically via e-mail or on paper, by mail). In your written request (submitted via e-mail or on paper), please specify in which form you would like to receive the reply (electronically via e-mail or on paper, by mail), otherwise the Insurer will forward the reply to you in the form consistent with your request. The Insurer will provide a reply on the merits of your request or inquiry related to data management within 30 days of the receipt thereof, or within 60 days in exceptional cases (e.g. considering the complexity of the request). In the latter case the Insurer will notify you separately of the extension of the deadline for reply and the reasons for the extension, within 1 month of the receipt of the request.

I am not of legal age yet; how should I proceed?

If you are not 16 years old yet, then you may enforce the rights detailed above with the approval of your legal representative – i.e. most commonly your parent who exercises the parental rights. If you are over the age of 16 but below the age of 18, then you may grant consent to the data management independently, however, you may exercise the rights detailed above only with the approval of your legal representative, i.e. most commonly your parent who exercises the parental rights.

Which rights may be exercised related to the personal data of deceased relatives?

For 5 years following the death of the data subject, the person authorized by the data subject during his/her life in public document or in private document of full probative value may in respect of the personal data of the data subject exercise the rights to information, rectification, erasure, objection and the right to restrict the data management. If the data subject did not authorize anybody during his/her life, then for 5 years following his/her death, his/her close relative (from among the spouse, next of kin, adopted children, stepchildren, foster children, adoptive parents, stepparents, foster parents, and siblings as close relative the person who acts first) shall be entitled to exercise the right to rectification and objection, as well as in case the data management had already been unlawful in the of the data subject, or if the purpose of data management ceased upon the death of the data subject, then the close relative may also exercise the right to erasure and the right to restrict the data management. The Insurer shall reply to any inquiry, request related to the personal data of the deceased and received from the person authorized to submit such inquiry, request within 25 days of the receipt thereof.

5. Which legal remedies are available? – Data protection officer, supervisory authority, court

In all matters related to data management and to exercising the rights detailed above, as well as regarding the reply given by the Insurer to data management requests and inquiries, you may contact the data protection officer of the Insurer, through the following contact details:

Data protection officer	
Name:	dr. Klaudia Fekete-Gyüre
E-mail address:	dataprotection@medicarebiztosito.hu
Mailing address:	H-1134 Budapest, Váci út 29-31.

You may lodge a complaint regarding the Insurer's data processing with the data protection supervisory authority, namely the National Authority for Data Protection and Freedom of Information, using the contact details below:

Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information)	
Registered seat:	H-1055 Budapest, Falk Miksa utca 9-11.
Mailing address:	H-1363 Budapest, Pf.: 9.
E-mail address:	ugyfelszolgalat@naih.hu
Telephone number:	+36 (1) 391-1400
Website:	http://naih.hu

In addition to the above, you may refer to the court in order to enforce your rights and claims related to data management. You may initiate the litigation proceeding before the court of your place of residence or place of stay as well.

6. Provisions concerning the maintenance of insurance confidentiality

With regard to insurance secrets, subject to no time limit – unless otherwise provided for by law – the Insurer, the owners, directors and employees of the insurance intermediary, and all those who have gained access to such information in any way in the course of their activities relating to the Insurer, are bound by a duty of confidentiality. Insurance secrets may only be disclosed to a third party if

- a) the Insurer's customer or their representative, having precisely specified the scope of the insurance information that may be disclosed, grants a waiver in writing in this regard,
- b) there is no duty of confidentiality under Act LXXXVIII of 2014 on Insurance Activities (IA.),

- c) the certification body appointed by the insurer or reinsurer, and its subcontractor, become aware of this in the course of carrying out the certification procedure,
- d) it is in the insurer's interest to do so in order to sell its claim against the customer or to enforce that claim.

List of organisations authorised by IA to access confidential insurance information

Section 138.

(1) The requirement of confidentiality concerning insurance secrets shall not apply to:

- a) the Authority in exercising its designated functions;
- b) the body conducting preliminary proceedings, the investigating authority, the public prosecutor's office, the NVVH and the police and the Nemzeti Adó- és Vámhivatal (*National Tax and Customs Authority*) when acting in the capacity of misdemeanor authority;
- c) the court of law in connection with criminal cases, civil actions or non-contentious proceedings, and administrative actions, including the experts appointed by the court, and the independent court bailiff, the administrator acting in bankruptcy proceedings, the temporary administrator, extraordinary administrator, liquidator acting in liquidation proceedings in connection with a case of judicial enforcement, the principal creditor in debt consolidation procedures of natural persons, the Családi Csődvédelmi Szolgálat (*Family Bankruptcy Protection Service*), the family administrator, the court;
- d) notaries public, including the experts they have appointed, in connection with probate cases;
- e) the tax authority in the cases referred to in Subsection (2);
- f) the national security service in exercising its designated functions;
- g) the Gazdasági Versenyhivatal (*Hungarian Competition Authority*) in exercising its designated functions;
- h) the guardian authority in exercising its designated functions;
- i) the government body in charge of the healthcare system in the case defined in Subsection (2) of Section 108 of Act CLIV of 1997 on Health Care;
- j) bodies authorized to conduct covert information gathering operations if the conditions prescribed in specific other act are provided for;
- k) providers of reinsurance, other members of the group and providers of co-insurance, where applicable;
- l) the bureau of insurance policy records maintaining the central policy records with respect to data transmitted as governed by law, the claims records agency keeping accident and claims records, the traffic control authority in connection with road transport administrative actions relating to vehicles which are not listed in the motor vehicle registry, and the body operating the register of motor vehicles;
- m) the receiving insurance company with respect to insurance contracts conveyed under a portfolio transfer arrangement, as provided for by the relevant agreement;
- n) with respect to the information required for settlement and for the enforcement of compensation claims, and also for the conveyance of these among one another, the body operating the Compensation Fund and/or the Claims Guarantee Fund, the National Bureau, the correspondent, the Information Center, the Claims Organization, claims representatives and claims adjustment representatives, or the responsible party if wishing to access – in exercising the right of self-determination – the particulars of the other vehicle that was involved in the accident from the accident report for the purpose of settlement;
- o) the outsourcing service provider with respect to data supplied under outsourcing contracts, and the auditor with respect to data required for carrying out the audits;

p) third-country insurance companies and insurance intermediaries in respect of their branches, if they are able to satisfy the requirements prescribed by Hungarian law in connection with the management of each datum and the country in which the third-country insurance company is established has regulations on data protection that conform to the requirements prescribed by Hungarian law;

q) the commissioner of fundamental rights in exercising its designated functions;

r) the Nemzeti Adatvédelmi és Információszabadság Hatóság (*National Authority for Data Protection and Freedom of Information*) in exercising its designated functions;

s) the insurance company in respect of the bonus-malus system and the bonus-malus rating, and the claims record and the bonus-malus rating in the cases specified in the decree on the detailed rules for the verification of casualties;

t) the agricultural damage survey body, the agricultural administration body, the agricultural damage compensation body, and the institution delegated to conduct economic assessments under the supervision of the ministry directed by the minister in charge of the agricultural sector in respect of insured persons whom are parties to agricultural insurance contracts concluded for standing crops;

u) the authority maintaining a register of liquidator companies;

v) MABISZ in connection with gathering data provided through the e-claim platform provided for in the MVI with respect to operating the e-claim reporting application, for collecting information relevant to the insured event and forwarding such information to the insurance companies for the purpose of settlement;

upon receipt of a data request, and/or written inquiry from a body or person referred to in Paragraphs a)-j), n), s), t) and u) indicating the name of the client or the description of the insurance contract, the type of data requested and the purpose of and the grounds for requesting data, with the exception that the bodies or persons referred to in Paragraphs p)-s) are required to indicate only the type of data requested and the purpose and grounds for requesting it. An indication of the statutory provision granting authorization for requesting data shall be treated as verification of the purpose and legal grounds.*

(2) Pursuant to Paragraph e) of Subsection (1), there shall be no confidentiality obligation concerning insurance secrets in connection with tax matters where the insurance company is required by law to disclose specific information to the tax authority upon request and/or to disclose data concerning any payment made under an insurance contract that is subject to tax liability.

(2a) The obligation of confidentiality concerning insurance secrets shall not apply to financial institutions provided for in the CIFE in connection with insurance contracts linked to claims arising out of financial services, if the financial institution makes a written request to the insurance company indicating the name of the client or the description of the insurance contract, the type of data requested and the purpose for requesting it.

(3) The disclosure made by an insurance company to the tax authority in compliance with the obligation prescribed in Sections 43/B-43/C of Act XXXVII of 2013 on International Administrative Cooperation in Matters of Taxation and Other Compulsory Payments (hereinafter referred to as "IACA") in accordance with Act XIX of 2014 on the Promulgation of the Agreement between the Government of Hungary and the Government of the United States of America to Improve International Tax Compliance and to Implement FATCA, and on the Amendment of Certain Related Acts (hereinafter referred to as "FATCA Act") shall not be construed as violation of insurance secrets.

(3a) The disclosure made by an insurance company to the tax authority in compliance with the obligation prescribed in Section 43/H of the IACA, and under Sections 43/B and 43/C of the IACA in accordance with the FATCA Act shall not be construed as violation of insurance secrets.

(4) Insurance and reinsurance companies shall be authorized to disclose the personal data of clients in the cases and to the agencies indicated in Subsections (1) and (6) hereof and in Sections 137, 140 and 141.

(5) The confidentiality requirement shall apply to the employees of the agencies specified in Subsection (1) beyond the framework of their official capacity.

(6) Insurance and reinsurance companies shall be required to supply information forthwith where so requested in writing by the body conducting preliminary proceedings, the investigating authority, the public prosecutor's office, the NVVH and the court, including data requests, if there is any suspicion that an insurance transaction is associated with:*

a) illegal possession of narcotic drugs, illegal possession of new psychoactive substances, acts of terrorism, criminal misuse of explosives or blasting agents, criminal misuse of firearms and ammunition, money laundering, or any felony offense committed in criminal conspiracy or within the framework of a criminal organization under Act IV of 1978 in force until 30 June 2013;

b) illegal possession of new psychoactive substances in effect in the Criminal Code until 15 June 2025;

c) unlawful drug trafficking, possession of narcotic drugs, inciting substance abuse, aiding in the manufacture or production of narcotic drugs, illegal possession of mind altering substances, acts of terrorism, failure to report a terrorist act, terrorist financing, criminal misuse of explosives or blasting agents, criminal misuse of firearms and ammunition, money laundering, or any felony offense committed in criminal conspiracy or within the framework of a criminal organization under the Criminal Code.

(6a) Upon receipt of a data request made in accordance with Subsections (3) and (4) of Section 69 of Act XXXIV of 1994 on the Police, Subsection (3) of Section 58 of Act CXXII of 2010 on the Nemzeti Adó- és Vámhivatal or Subsections (3)–(5) of Section 262 of Act XC of 2017 on the Code of Criminal Procedure (hereinafter referred to as „CP”), insurance companies and reinsurance companies shall comply with such requests for data, considered insurance secrets, from their records without authorization by the public prosecutor's office or the NVVH. Where data is requested according to Section 262/A of the CP, the insurance company or reinsurance company is required to comply with the data request regarding the data it has on record for the client or the fund agreement, classified as insurance secrets, without authorization by the public prosecutor's office or the NVVH.

(7) The obligation of confidentiality concerning insurance secrets shall not apply where an insurance or reinsurance company complies with the obligation of notification prescribed in the Act on the Implementation of Restrictive Measures Imposed by the European Union and the UN Security Council Relating to Liquid Assets and Other Financial Interests.

(8) The disclosure of the group examination report to the dominating member of the financial group during the supervisory oversight proceedings in the case of group supervision shall not constitute a breach of confidentiality concerning insurance secrets and trade secrets.

(9) The disclosure of information provided in compliance with Section 164/B shall not be construed a breach of insurance secrets.

Section 139/A.

In order to effectively perform the tasks specified by law, the insurance company or reinsurance company may conclude a cooperation agreement with the investigating authority, the public prosecutor's office and the NVVH.

Section 140.

(1) It shall not constitute a violation of professional secrecy where an insurance or reinsurance company supplies information to a third-country insurance or reinsurance company or a third-country data processing agency:

- a) if the client to whom such information pertains (hereinafter referred to as "data subject") has given his prior written consent, or
- b) if – in the absence of the data subject's consent – the data transfer is made in compliance with the provisions applicable to the transfer of personal data to third countries.

(2) The provisions governing data disclosure within the domestic territory shall be observed when sending data that is treated as an insurance secret to another Member State.

Section 141.

(1) The following shall not be construed a breach of insurance secrecy:

- a) the disclosure of data compilations from which the clients' personal or business data cannot be identified;
- b) in respect of branches, transfer of data for the purpose of supervisory activities to the supervisory authority of the country where the registered address (main office) of the foreign-registered company is located, if such transfer is in compliance with the agreement between the Hungarian and the foreign supervisory authorities;
- c) disclosure of information, other than personal data, to the minister for legislative purposes and in connection with the completion of impact assessments;
- d) the disclosure of data in order to comply with the provisions contained in the Act on the Supplementary Supervision of Financial Conglomerates.

(2) Insurance and reinsurance companies may not refuse to disclose the data specified in Subsection (1) on the grounds of protection of insurance secrets.

Section 142.

(1) The personal data indicated in the data transfer records, and the data treated as special data or personal data from the criminal records shall be deleted, respectively, after five years and twenty years following the date of disclosure.

(2) The insurance or reinsurance company shall not be authorized to notify the data subject when data is disclosed pursuant to Paragraphs *b)*, *f)* and *j)* of Subsection (1) of Section 138 or Subsection (6) of Section 138.

(3) Insurance and reinsurance companies shall be entitled to process personal data during the life of the insurance or reinsurance contract or other contractual relation, and as long as any claim can be asserted in connection with the insurance, reinsurance or contractual relation.

Budapest, 1st June 2026.

Medicare Biztosító Zrt.

Medicare Insurance Private Ltd.