

## PRIVACY POLICY

### of the Medicover Sport sp. z o. o. Mobile App – Medicover Sport

The following document describes how we protect the privacy of users of the Medicover Sport sp. z o.o. mobile app - **Medicover Sport** (hereinafter: “**the App**”).

The App may be used on mobile devices running the following operating systems:

- iOS
- Android

#### I. What data do we collect and for how long do we retain it?

Upon your download and first launch of the App, we receive information regarding its installation and activation, including: the App activation timestamp, the timestamp of the last launch, and the unique identifiers of the App.

##### a) Information stored on your device

Upon activation of the App, your sports pass number may be saved on your device.

In addition, the file supporting the App stores information relating to App settings and your usage preferences, such as: the language used by the device, the type of sports pass, the App identifier assigned by the App, the App identifier assigned by the user, and the profile photograph associated with your App account.

If you use the in-app Store, data entered in the purchase form may also be saved on your device in order to facilitate future purchases.

The above data may be removed from your device upon uninstalling the App or by using the option to clear the App’s data from the device cache memory.

Files downloaded by you from the App are saved by default on your device. The retention period depends on your preferences.

##### b) Information collected by us during your use of the App

In order to improve the quality of the App’s performance, optimise its functionality, and identify technical errors, we use the analytical tools Microsoft Clarity, provided by Microsoft, and Google Analytics, provided by Google LLC.

### **Scope of processed data**

When using Microsoft Clarity and Google Analytics, the following data may be collected and processed:

- information about the manner in which the App is used, including user interactions (e.g. clicks, scrolling, navigation between screens),
- data relating to activity within the App (e.g. duration of use, screens visited),
- technical information relating to the device and the user's environment (e.g. device type, operating system, screen resolution),
- events associated with App performance (e.g. technical errors),
- to a limited extent, session recordings may also be created, consisting of replays of user interactions with the App.

### **Data protection and limitations**

- data is not used for the direct identification of the user,
- the scope of data collected is limited to the minimum necessary for the stated purposes.

### **Purpose of data processing**

Data is processed solely for the following purposes:

- analysis of how the App is used,
- identification of errors and technical issues,
- improvement of usability (UX) and functionality of the App,
- optimisation of system performance.

### **Legal basis for processing**

Data collected in connection with use of the App is processed on various legal grounds depending on the purpose of processing: data necessary for the proper functioning of the App, its security, stability, and the detection and resolution of technical errors (including technical logs) is processed on the basis of Article 6(1)(f) of the GDPR, i.e. the legitimate interests of the Controller, whereas data processed for analytical and statistical purposes - in particular through the use of analytical and statistical tools (Microsoft Clarity and Google Analytics) - is processed on the basis of the user's voluntary consent in accordance with Article 6(1)(a) of the GDPR. Such consent may be withdrawn at any time via the relevant settings under "My Profile" → "My Consents" without affecting the ability to use the core functionalities of the App.

### **User rights**

Granting consent to the processing of data for analytical purposes is voluntary and does not affect the ability to use the core functionalities of the App.

The user has the right to withdraw their consent at any time.

Detailed information on data collection by Microsoft Clarity and Google Analytics is available at:

<https://www.microsoft.com/en-us/privacy/privacystatement>

<https://policies.google.com/privacy?hl=pl>

Additionally, the App server stores logs relating to the use of the App, such as confirmation of entry to the facility and the handling of sports passes.

## **II. What security measures does the App employ?**

In order to protect your data during use of the App, we have implemented encryption mechanisms (SSL) to ensure the security of data transmitted between our systems and the App.

**Please ensure that the device on which you install the App is adequately secured.**

## **III. Which device functions does the App access?**

With your permission, the App will gain access to certain functions of your device. The functions available may vary depending on the operating system used on your device.

- GPS location (primarily for the purpose of displaying nearby facilities),
- SMS-related functions (to facilitate entry to facilities),
- Email client (to facilitate sending messages to us),
- Outgoing calls (to redirect to our Helpline),
- Storage (relating to the profile photograph in the App).

## **IV. Blocking the App's access to device functions**

When using the App, you may block or re-enable access to device functions at any time from within the App settings in your phone's operating system.

## V. Where to find further information?

You may contact us:

- by post to: Customer Service Office, Medicover Sport Sp. z o. o., Al. Jerozolimskie 96, 00-807 Warsaw
- by email: [bok@medicoversport.pl](mailto:bok@medicoversport.pl)
- over the phone: +48 500 900 990

We encourage you to read our Privacy Policy and the information on the processing of personal data for the purposes of the MULTIPAKIET programme, where you will find additional information on how we collect and use personal data, as well as details of your rights in connection with such processing: <https://medicoversport.pl/en/privacy-center>.

The controller of personal data processed within the App (with the exception of personal data provided for the purposes of processing orders in the in-app Store) is Medicover Sport sp. z o.o., with its registered office in Warsaw, al. Jerozolimskie 96, 00-807, Warszawa Poland, entered in the Business Register maintained by the District Court for the Capital City of Warsaw in Warsaw, under KRS number 0000909046 (hereinafter: “**the Controller**”).

Recipients of personal data may only be entities authorised to process it on the basis of applicable law or agreements concluded, in particular:

- A)** Entities processing personal data on behalf of the Controller, to the extent necessary for the purposes for which the data was collected, in particular IT solution and information system providers, and entities providing maintenance, technical support, and development services for the App; such entities process data solely on the basis of data processing agreements and in accordance with the Controller’s instructions,
- B)** [to a limited extent:] The entity that has enabled the User to access the services available within the App (e.g. an employer or other entity financing the pass),
- C)** Entities authorised by the User or by law to receive personal data,
- D)** Payment intermediaries - to the extent necessary for processing payments related to the fulfilment of orders,
- E)** [to a limited extent:] Controller’s partners, in particular sports facilities visited by the User – to the extent necessary for verifying entitlements, registering entry, or providing services,
- F)** Entities fulfilling orders placed via the in-app Store, in particular Medistore, which, in respect of the data transferred to it, acts as a separate data controller and processes such data in accordance with its own privacy policy and terms and conditions.

In each case, personal data is transferred only to the extent necessary for the fulfilment of a specified purpose, with appropriate security measures applied and in compliance with applicable legislation.

You have the right to request from the Controller: access to your personal data, rectification, erasure, or restriction of processing, as well as the right to object to processing and the right to data portability. Where your data is processed on the basis of your consent, you have the right to withdraw that consent at any time without any adverse consequences. You also have the right to lodge a complaint with the supervisory authority responsible for personal data protection, namely the President of the Office for Personal Data Protection (Polish: Prezes Urzędu Ochrony Danych Osobowych).

## **VI. The in-app Store**

The controller of personal data provided for the purposes of processing orders in the in-app Store is Medicover Sp. z o.o., al. Jerozolimskie 96, 00-807 Warsaw, Poland (hereinafter: “**Medistore**”).

In connection with the use of the in-app Store functionality available within the App, the following personal data may be processed:

### **a) Data for the fulfilment of orders, saved locally on the User’s device:**

- full name,
- residential address / correspondence address,
- telephone number,
- email address,
- country,
- other data necessary for the fulfilment of the order, including for the purpose of issuing an invoice.

### **b) PESEL number – solely where required by law or by the nature of a particular product.**

#### **These details:**

- are transferred by Medicover Sport sp. z o.o. to Medistore, which acts as a separate data controller in respect of order fulfilment;
- are saved on the User’s device in order to simplify the process of placing future orders;
- are not retained or stored by Medicover Sport;
- are not accessible to Medicover Sport in any manner other than its transfer to Medistore for the purposes of fulfilling the order.

Data is processed solely for the purposes of fulfilling, processing, and settling the order. Medicover Sport bears no responsibility for the data processing practices of Medistore beyond the scope of such transfer.

Order fulfilment is carried out in accordance with:

- [Medistore Privacy Policy](#)
- [Medistore Terms and Conditions](#)

In respect of orders placed via the in-app Store, Users have the right to submit complaints. Complaints relating in particular to:

- payments,
- order fulfilment,
- delivery of a product or service,
- quality of the service provided or the product purchased,

are handled by **Medistore**, which acts as a separate data controller and the entity responsible for order fulfilment. Complaints relating to these matters will be forwarded by Medicover Sport to Medistore for resolution.

Medicover Sport is responsible for the proper functioning of the App, including in particular the display of offers available in the in-app Store and the technical operation of the App. Complaints relating to the functioning of the App or the presentation of offers will be handled by Medicover Sport.

## VII. Additional features of the App

a) The use of certain additional features of the App may be subject to separate data processing rules. Such rules are described in each case in dedicated terms and conditions or privacy policies relating to the relevant functionalities.

The processing of personal data within these functionalities is carried out in accordance with the conditions set out in the relevant documents.

b) Depending on the type of pass held or the specific services used, the App may display various items of information, messages, or operational requirements, in particular:

- dedicated news or organisational information,
- messages concerning the requirement to present a document confirming entitlement or identity, where this is necessary for the provision of a given service.

These activities are purely functional and organisational in nature and serve the purpose of ensuring the proper delivery of services. They do not involve the assessment of the User's personal characteristics or automated decision-making producing legal effects concerning the User or similarly significantly affecting them.

### **VIII. If you do not agree with this Privacy Policy, you may uninstall the App or refrain from installing it.**

The provision of personal data is voluntary; however, in certain cases it is necessary for the fulfilment of specific purposes, in particular for:

- the use of services and functionalities of the App,
- the fulfilment of orders placed via the in-app Store,
- the transfer of data to entities fulfilling the order (including Medistore).

Failure to provide personal data may result in the inability to use selected functionalities of the App, to fulfil an order, to provide certain services, or to carry out other actions whose performance requires the processing of such data.