

PRIVACY NOTICE

At PANACEA MEDICAL CENTER we understand that your privacy is important to you and that you care about how your personal data is used. We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the applicable local legislation, the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003 and the- EU Regulation No. 2016/679 the General Data Protection Regulation (collectively “**GDPR**”). This Privacy Notice sets out the basis on which we may collect, use or otherwise process personal data via our website <https://www.panacea-cy.com> (**Website**), downloadable software, mobile applications, desktop applications, content, features, function and/or via the Account and/or via any other services provided by us and on which a link to this Privacy Notice is displayed, and/or all other communication with you through written or oral means, such as email, chat or phone (collectively the “**Services**”) when you use our Services and the choices you have associated with that personal data.

Please note that this Privacy Notice is addressed to our prospective, current and former clients or third party contractors. If you are, were or may be a potential, current and former employee or third party contractor your personal information will be used in accordance with a separate privacy policy.

We use your personal data to provide and improve our Services. Your acceptance of this Privacy Notice is deemed to occur upon your first use of our website and any of the Service.

1. WHO WE ARE

PANACEA MEDICAL CENTER, a duly registered trademark of IVEATO LTD a company incorporated and registered in the Republic of Cyprus under company registration number HE449618 and its affiliated entity PAVLIK MARANGOS IRINA DLC a licensed medical company incorporated, registered and duly licensed in Cyprus with registration number HE 430736 both having their business address at 47A, Eleftherias Avenue, 7101 Aradippou, Larnaca (collectively referred to as “**PANACEA MEDICAL CENTER**”, “**Company**”, “**we**” or “**us**”) and are the joint Controller(s) and responsible for the personal information you disclose to us to make use of our Services.

We take measures to implement advanced data protection policies and procedures and to update them from time to time for the purpose of safeguarding the User's data. Your data is protected by the legal, administrative and technical measures that we take to ensure the privacy, integrity and accessibility of data. To prevent security incidents with your data, we use a mixed organizational and technical approach based on the results of our annual risk assessment.

We shall not divulge any private information of our Users and/or former Users unless the User approves in writing such disclosure or unless such disclosure is required under applicable law or is required in order to verify the User's identity, or it is required for us to perform our contractual obligations under any agreement concluded with the User. The Users' information is processed only by our employees and/or trusted third parties which provide specific services, dealing with the specific Client's Account and necessary for the provision of our Services. All such information shall be stored on electronic and physical storage media according to applicable law.

2. DATA COLLECTIONS AND PROCESSING

We collect, process, store and transfer different kinds of personal data about you for various purposes in order to be able to provide and improve our Service to you. Depending upon your use of the Service we may collect some or all the personal data set out below as follows. Please also see Cookies Section for more information about our use of Cookies and similar technologies.

- **Identity Data** includes first name, last name, and patronymic (if available), date of birth gender, passport, ID, Driver's number, and copy of photo.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in type and versions, operating system and platform, and other technologies on the devices you use to access the Website and use of cookies stored on your device.
- **Profile Data** includes your Account details, username and password, transactions made by you, your interests, preferences, feedback and/or information received through your interaction with us within the course of providing our Services and survey responses.
- **Usage Data** includes information about how you use Website, products and Services and IP history.
- **Data in KYC (Know your customer)** includes identity document information, including copies of recently dated Utility Bills, Identity Card, Passport, and/or Driver's License, Tax Identification Numbers (TIN).
- **Location Data** includes details on your actual location when interacting with our Website (for example, a set of parameters that determine regional settings of your interface, namely residency country, time zone, and the interface language).
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Audio Data** includes full voice recordings of calls that you receive from us or make to us.
- **Aggregated Data** includes statistical or demographic data for any purpose. Such data can be derived from your data but may not be considered personal data in law as it will not directly or indirectly reveal your identity. An example of such Aggregated Data could be that we aggregate your Usage Data to calculate the percentage of users accessing a specific website feature and/or services/product preference. Notwithstanding the above, if the Company combines Aggregate Data with data in a way that the end result can in any way identify the data subject, the Company shall treat such combined data as data which will be treated as per the provisions herein contained.
- **Sensitive personal information:** Sensitive personal information is information that relates to a person's: Racial and ethnic origin, medical conditions, physical or mental health or genetic or biometric data. if absolutely necessary, be required to collect some information that may be classified as "sensitive". Generally, it is necessary to obtain your consent before we can hold and use such information. However, we may hold and use such information without consent for limited statutory purposes such as monitoring compliance with our equal opportunities policies and health and safety rules, or if necessary to protect your vital interests, for legal claims, or in the public interest. In any case, we will make clear the purposes for which we wish to use your sensitive information when it is being collected, and, if necessary, obtain your consent at that time.

(the above collectively referred to as “**personal data**”).

Our Website is not intended for children and we do not knowingly collect data relating to children. As we do not allow users under the age of 18 to use our services, we need to obtain your birth date in order to confirm the Clients’ age checks.

3. PROCESSING OF YOUR DATA

Processing of your personal data is carried out by us following the principles of lawfulness, fairness, transparency and always adhering to the intended purpose of data processing, the principle of data minimization, accuracy, limited data storage, data integrity, confidentiality and accountability. We may process your personal data for any of the following reasons:

- To perform its contract with you,
- To perform compliance checks, such as verification of your identity, and helping to detect fraudulent or malicious activity on our website or services,
- To maintain our accounts and records,
- To manage our business needs, such as monitoring, analysing, and improving the services and the Website’s performance and functionality,
- To comply with all applicable laws and regulations; and/or
- For the purposes of safeguarding our legitimate interests and your interests and fundamental rights do not override those interests.

4. DATA RETENTION

We will not keep your personal data for any longer than is necessary considering the reason(s) for which it was first collected in accordance with this Privacy Notice. To determine the appropriate retention period for your personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting and other requirements.

To comply with the applicable legal, regulatory, tax, accounting requirements we keep your personal data for a minimum period of 5 years from the date our business relationship is terminated. We may need to retain your information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate business purposes, such as to respond to queries or complaints, fighting fraud and financial crime and responding to requests from regulators.

At the expiration of the personal data retention period the personal data is erased by irreversible destruction and we also inform all third parties, to whom the personal data was transferred, regarding such erasure and request implementation of similar actions on their part.

5. DATA SECURITY

We protect your data by adhering to industry standard regulations on data protection by categorising them into data types (e.g. technical, personal data, cookie data, etc) while applying relevant protection processes and due diligence procedures. Therefore, we apply appropriate technical and organisational controls to protect your data, including secure computer systems adopting least privilege access in order to prevent unauthorised access, disclosure, modification, or destruction of personal data.

Protection of your personal data in our infrastructure. We make it a priority to develop Services that are secure "by default". The "default" security of our Services means that every new service and features are designed with strict security requirements in mind before we even begin development. This is the key to guaranteed protection and privacy of all personal data that our Services handle and store, once the service or new feature is released.

We are always vigilant about the Security of the personal data stored in our infrastructure. Because of that we locate all our equipment used for your personal data processing in secure personal data centers. Network access to this equipment is isolated from the Internet. We use network segmentation for isolation of Services which need different level of security from each other. In addition, we restrict logical access to the personal data for our employees on "need to know" basis. So, only personnel, who really require access to the personal data for the purpose of providing you with our best Service, will have access to it.

Threats protection. We are is highly knowledgeable about modern threats to personal data security and privacy, and we are well prepared to combat them. All events that occur in our infrastructure are continuously monitored, analysed and responded, which allows us to ensure proper protection of your personal data, keeping it safe from threats, vulnerabilities, and the effects of malware.

In the event of a failure that affects the accessibility of your personal data, we have personal data backup and recovery procedures in place that will us help to restore your personal data in short time. For further guarantee the quick recovery we use high availability mode enabled for most critical databases which allows us to minimize downtime.

Employee awareness of data security.

Our employees will handle your personal data in order to provide you with the first-class Service. To guarantee the security and confidentiality of your personal data, we monitor all employees' actions with access to your personal data in our systems and grant access strictly on a "need to know" basis: only employees who need access will receive it. We hold regular training sessions to make sure that each employee understands the principles that we follow to achieve robust data security and privacy.

If you choose not to give your personal information.

In the context of our business relationship we may need to collect data by law, or under the terms of a contract we have with you. Without this data, we are, in principle, not in a position to close or execute a contract with you. If you choose not to give us this data, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform the Services.

6. DATA COLLECTIONS

We use different methods to collect data from and about you including through:

Direct Interactions. You will provide to us your Identity, Contact and Financial Data online through the Website and/or by completing and filling online forms and/or by corresponding with us by emails or otherwise. Personal data is submitted to us when you register an Account with us.

We require to collect the above data in order to that we are able to (i) provide our services efficiently, (ii) to comply with our ongoing legal and regulatory obligations, including, inter alia, (a) to prevent fraud and money laundering acts and/or (b) conduct the assessment of suitability and appropriateness test.

If you fail to provide the data when requested we may not be able to perform the contract we have or trying to enter into with you (for example, to provide you with our Services). In this case, we may have to cancel a Service you have with us but we will notify you if this is the case at the time.

It is important that the data we hold about you is accurate and current. Please keep us informed if your data changes during your relationship with us.

Automated Technologies or Interactions. When using our services, your device automatically transmits to us its technical characteristics. Locale (a set of parameters that determine regional settings of your interface, namely, residence country, time zone and the interface language) is used for the purpose of providing you with the best possible service within our platform.

Using the information about IP address, cookies files, information about browser and operating system used, the date and time of access to the site, and the requested pages addresses allows us to provide you with the optimal operation on our web application, mobile and/or desktop versions of our application and monitor your behavior for the purpose of improving the efficiency and usability of our Services.

We use web analytics tools to track performance of our website and marketing source of user by cookies in order to optimize our marketing costs and provide users with better experience.

You may at any time request that we refrain from any such transmissions (to the degree this is possible and subject to any of our legal obligations) by sending your request to the DPO using our details in the OUR CONTACT DETAILS below using the registered email address you disclosed and registered with us. We will address your request within 30 business days.

7. COOKIES

A cookie is a small amount of data that often includes a unique identifier that is sent to your computer or device browser from a website's computer and is stored on your device's hard drive for tracking site usage. A website may send its own cookie to your browser if your browser's preferences allow it, but, to protect your privacy, your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other websites. First-party cookies are those placed directly by us and are used only by us. We use cookies to facilitate and improve your experience of our Website and to provide and improve our products and Services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is always protected and respected.

By using our Website, you may also receive certain third-party cookies on your computer or device. Third-party cookies are those placed by websites, services, and/or parties other than us. For more details, please refer to the table below. All Cookies used by and on our Website are used in accordance with applicable legislation on the use of cookies

Our Website uses analytics services, which are a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our Website is used. This, in turn, enables us to improve our Website and the Services offered through it. You do not have to allow us to use these cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our Website, it does enable us to continually improve our Website, making it a better and more useful experience for you.

You will be required to provide cookie consent by acknowledging the privacy and cookie policies during registration of your account. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our Site may not function fully or as intended.

You can choose to delete cookies on your computer or device at any time, however you may lose any information that enables you to access our Website more quickly and efficiently including, but not limited to, login and personalisation settings. It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

You can instruct your browser to enable or disable cookies, refuse all cookies or to indicate when a cookie is being sent. Please note that by doing so you may not be able to use all the provided functions of our Website and/or Services in full.

We use the following cookies:

Strictly Necessary Cookies	These are cookies that are required for the operation of Our Site. They include, for example, cookies that enable you to log into secure areas of our website.
Analytics and Performance Cookies	We use third party analytics providers, such as Google Analytics to collect information about the usage of our services and enable us to improve how these services work, for example, by ensuring that users are finding what they are looking for easily.
Functionality Cookies.	These are used to recognise you when you return to Our Site. This enables us to personalise our content for you and remember your preferences (for example, your choice of language or region).
Targeting Cookies	We use third party targeting tools, such as LinkedIn Insights and ads tags. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

Please see our <https://panacea-cy.com/cookies.pdf> for further details

8. HOW MIGHT WE SHARE YOUR PERSONAL DATA

We may disclose data that concerns you only if (i) we are legally required to do so; (ii) if required when you expressly order us to process a transaction or any other service and (iii) it is required for the provision of our Services under our contractual relationship and/or (iv) protection of our legitimate interests, in accordance with the provisions of the GDPR and applicable local legislation as amended from time to time.

We may share your personal data in the following circumstances, the following are examples of where and how your information may be transferred, but please note this is not an exhaustive list and that due to ongoing changes in our IT and operational infrastructure this may change at any time:

- We may share your data between our related entities on a confidential basis in order to provide you with our Services.
- We may have to share your personal data with third parties service providers, processing data on our behalf, who help us with our business operations. When your personal data is shared with a third party, we will take the necessary steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law. We ensure that our contracts with those third parties contain the appropriate GDPR model clauses and that all our third parties are also compliant with the GDPR, this affords your data the same protection away from our organisation, as it does within it. Your personal data is shared with third party organisations/entities including but not limited to:

A. Service Providers. We may share your personal data with our trusted third party service providers, who, on our behalf, operate, maintain, and/or support our IT systems and IT infrastructure, our websites, manage our payment solutions, perform statistical analysis, marketing and advertising purposes, sending newsletters, provide customer support and perform other important services for us. We will store and process your data following industry best practice and security.

B. Regulator and state authorities. The Company will make such disclosure only if required to be disclosed by the Company by applicable law, regulation or court order and to the minimum required extent.

D. Other disclosures. In addition to where you have consented to a disclosure of the data or where disclosure is necessary to achieve the purpose(s) for which, it was collected, data may also be disclosed in special situations, where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring, or interfering (intentionally or unintentionally) with our rights or property, users, or anyone else who could be harmed by such activities, or otherwise where necessary for the establishment, exercise or defence of legal claims.

Where reasonably possible, management shall ensure that third parties collecting, storing or processing personal information on behalf of the Company have:

- Signed agreements to protect personal information consistent with this Privacy Notice and information security practices or implemented measures as prescribed by GDPR;
- Signed non-disclosure agreements or confidentiality agreements which includes privacy clauses in the contract; and/or
- Established procedures to meet the terms of their agreement with third party to protect personal information.

C. International Transfers. We process data within the EEA and countries deemed by the European Union as having adequate safeguards for protecting personal data. These countries are recognised by the EU as having suitable safeguards for the rights and freedoms of individuals and recourse processes by which data subjects can exercise their rights.

Should there be a business need to transfer or process your data to company(ies) and/or third parties might imply a transfer of your data to third countries, countries or regions which do not offer the same level of protection as the laws of your country (for example GDPR)(so called **Third Countries**) we will ensure that they are subject to appropriate security measures and

safeguards as deemed appropriate under GDPR and other relevant national and international data protection laws or that we otherwise comply with the requirements and standards under Regulation 2016/679 for transferring Personal Data abroad. This may include entering into the appropriate contractual agreements to regulate any such transfers and safeguard any personal information transferred to them. A transfer to a company and/or third party based in a Third Country would only take place where one of the following applies:

- The individual has given consent to the transfer of information
- The transfer is necessary for the performance of a contract between the individual and the Company, or the implementation of pre-contractual measures taken in response to the individual's request.
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between us and a third party.
- The transfer is necessary or legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.
- The transfer is required by law.
- The transfer is necessary in order to protect the vital interests of the individual.
- The transfer is made under a data transfer agreement.
- The transfer is otherwise legitimised by applicable law.

Remedial action shall be taken in response to misuse or unauthorized disclosure of personal information by a third party collecting, storing or processing personal information on our behalf.

If you want to obtain further information on any data transfers mentioned above please contact us using the registered email address you disclosed to us through the points of contact listed in the Section OUR CONTACT DETAILS.

9. YOUR RIGHTS

Under certain circumstances in accordance with GDPR and the applicable local legislation as amended from time to time you have rights, which we will always work to uphold. Some of the rights are rather complex and include exemptions, thus we strongly advise you to contact us (at the contact details listed in the section OUR CONTACT DETAILS below) and/or seek guidance from the regulatory authorities for a full explanation of these rights. You can find a summary of your rights below in this section:

- The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.
- The right to access the personal data we hold about you. Upon request and verification of your identity, we will send you a copy of the personal data we hold about you.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed if we have that data.

- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. We may not always be able to comply with your request of erasure for specific legal reasons, for which you will be notified. Please note that retention requirements supersede any right to erasure requests under the data protection laws.
- The right to restrict (i.e. prevent) the processing of your personal data. Please note that any requests in relation of the processing of your data means that we may not be able to provide you with the service, in which case you will be notified.
- The right to object us in using your personal data for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

10. CONTACT US

We only processes your personal data in compliance with this Privacy Notice and in accordance with GDPR, while meeting highest possible data protection standards, and as such, we treat data protection complaints with all seriousness. So, should you have any reservations or complaints as to how we process(ed) your personal data, you can contact us through the following address:

Full Name of Legal Entity:	PANACEA MEDICAL CENTER
Email Address:	info@panacea-cy.com
Postal Address:	47A, Eleftherias Avenue, 7101 Aradippou, Larnaca

To enable us to process your request, please contact us using the registered email address you disclosed and registered with us. We may require that you provide us with proof of your identity, such as by providing us with a copy of a valid form of identification. This is to ensure that we appropriately protect the personal data we hold from unauthorised access requests and comply with our security obligations.

If you have any questions, or want more details about how we use your data, you may contact us at the above contact details and we will be happy to provide you with further details.

If following your request to us we are unable to provide you with a satisfactory answer then you may lodge a complaint with the local data protection supervisory authority. The data protection supervisory authority in Cyprus is: Commissioner for Data Protection P.O. Box 23378, 1682 Nicosia, Cyprus- www.dataprotection.gov.cy

We would however appreciate the chance to deal with your concerns before you approach the GRA, so please contact us in the first instance.

11. LINKS TO OTHER WEBSITES

We may provide links to third party websites in our Website. These linked websites are not under our control, and we therefore cannot accept responsibility or liability for the conduct of third parties linked to our websites, including without limitation to the collection or disclosure of your data. Before disclosing your data on any other website, we encourage you to examine the terms and conditions of using that website and its privacy policies.

12. CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice was last updated November 1, 2023.

We have the right, at our discretion, to change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection and in order to ensure that the information herein provides relevant and adequate information about our collecting and processing of your data.

In case of any changes will be posted on the revised Privacy Notice on our Website Changes will take effect as soon as the revised version is made available on our website above. We recommend that you check the Website regularly to keep up-to-date. Your comments and feedback are always welcome. You may contact us at any time through the points of contact listed in the Section OUR CONTACT DETAILS above.