

## NOK Privacy statement

In this privacy statement, the NOK (Nederlandse Obesitas Kliniek) describes how it handles personal data of patients, users of the NOK app and visitors to its website.

### What data does the NOK process, and why?

In order to carry out its tasks, the NOK processes personal data. The overview below provides a list of the categories of personal data that can be processed by the NOK per category of data subjects (the persons to whom the data relate).

#### Patients

The NOK may process the following categories of personal data about patients:

- personal details and identification data such as name, address, postal code, place of residence, gender, date of birth, citizen service number (BSN), number and type of identity document, e-mail address, telephone number;
- financial and administrative data, such as patient number, treating physician, health insurer data, primary care physician details, appointment times;
- health data, such as complaint or care request, findings, objective, evaluation, plan, advice, aftercare, details, medical history, medication use, BMI;
- data on religion and ethnicity.

The NOK processes this personal data in order to provide good healthcare. The processing of personal data is necessary for the execution of the treatment agreement with the patient.

Special personal data regarding religion or ethnicity will only be processed with the patient's explicit consent.

#### Users of the NOK app

NOK may process the following categories of personal data about users of the app:

- personal and identification data such as name, date of birth, e-mail address, telephone number;
- financial and administrative data, such as patient number, hospital, treatment location, appointment times;
- health data, such as weight;
- patient-supplied photographs, notes, answers to questions;
- preferences for use of the app and information to be displayed, including regarding Ramadan, pregnancy, smoking and user-defined goals;
- technical data, such as the user's activities in the app, and data about the device, including its type and operating system.

The NOK processes this personal data – with the exception of technical data – in order to provide good healthcare. Processing is necessary for the execution of the treatment agreement with the patient. Technical data is processed for the legitimate interests of NOK and the app supplier, namely to measure the use of the app and improve its quality.

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### Website visitors

NOK may process the following categories of personal data about visitors to its website, for example if you complete a contact form:

- personal and identification data such as name, e-mail address, telephone number;
- any other information you provide to us, such as notes and how you found us;
- technical data, such as your IP address when you fill out a form.

In addition, depending on the preferences you specify, we may process personal data using cookies. For more information about this, please refer to our [cookie policy](#).

### Processing of health and administrative data

Health data is obtained from own research by NOK doctors. In addition, health data is obtained from the patient's general practitioner or other healthcare providers, by letter, telephone, e-mail or fax, or from the electronic patient record of the healthcare provider concerned. Administrative data is obtained through direct contact with the patient and provision by authorised health insurers.

The processing of health data always takes place in the context of treatments, by or under the responsibility of BIG-registered physicians. In addition, this information is available to the NOK complaints officer if a complaint or report makes this necessary.

### Provision of data to other healthcare providers

To the extent necessary for the treatment of the patient, the NOK may provide data to other healthcare providers, such as the hospital that performs surgery as part of the treatment.

If the patient is registered with a primary care physician, the data will be passed on to this primary care physician or his/her substitute. If the patient is not registered by name, a copy of the treatment notes will be provided to the patient upon request via the inspection procedure described below.

### Provision to third parties

Our starting point is that we share your personal data with third parties as little as possible. We may provide health and administrative information to other healthcare providers in the cases mentioned above. In addition, data is provided to the patient's health insurer and the Healthcare Inspectorate [Dutch Inspectie voor de Gezondheidszorg] or an agency authorised by it, for the purpose of assessing the functioning of the NOK.

Furthermore, we use the services of third parties for the purposes of our business operations, to whom we provide personal data in some cases. However, we will never share more data with these third parties than they need to carry out our assignments. Examples of such parties are suppliers, ICT service providers and postal delivery services.

In addition, we may be legally obliged to provide data to third parties, such as a government body or a judicial authority.

### Retention periods

The NOK stores personal data for periods determined in accordance with legal guidelines. Personal

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data will not be kept for longer than is necessary for the purposes for which the personal data is processed.

We are legally obliged to keep your medical record for at least twenty years after the end of the treatment agreement. We must retain certain financial data for at least seven years to comply with tax retention obligations.

### **Rights of data subjects**

You have the right to access your personal data, the right to have personal data that is incorrect rectified and the right to request the erasure of personal data relating to you.

Access, correction or deletion of personal data takes place after a written request accompanied by a valid proof of identity. This is possible in person with a NOK employee, or by e-mail to [nok@obesitaskliniek.nl](mailto:nok@obesitaskliniek.nl).

Please note: the right to rectification only applies to factual data, such as errors in your name or date of birth. If you do not agree with an opinion or conclusion of your treating physician, you cannot have it corrected. In that case, you can have written comments added to your medical record.

In addition, you have the right to obtain a restriction of processing in certain cases and to have the personal data concerning you transferred. You also have the right to object to the processing of your personal data on grounds relating to your particular situation. Finally, you have the right to file a complaint with the Dutch Data Protection Authority [Dutch Autoriteit Persoonsgegevens] if you believe that the processing of your personal data is not in accordance with legal requirements.

### **Changes**

The NOK reserves the right to make changes to this privacy statement. Any changes will be published on the website (<https://www.obesitaskliniek.nl/>), and of course we will inform you about them.

### **Data Protection Officer**

If you have any questions or complaints, please contact our Data Protection Officer: PO Box 601, 3700 AP Zeist, the Netherlands, +31 30 698 60 90, [gegevensbescherming@obesitaskliniek.nl](mailto:gegevensbescherming@obesitaskliniek.nl)

### **Data Controller**

Where this privacy statement refers to the NOK, it refers to the clinic where you are being treated: N.O.K. Nederlandse Obesitas Kliniek B.V., Nederlandse Obesitas Kliniek West B.V., Nederlandse Obesitas Kliniek Zuid B.V. or Nederlandse Obesitas Kliniek Zeeland B.V. The clinic is responsible for processing your personal data. If you are not a patient, Obesitas Nederland B.V. is responsible for the processing of your personal data, and the term "NOK" refers to this company. The NOK also trades under the name NOK Clinics.

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