

## PRIVACY NOTICE

### GENERAL

This Privacy Notice explains how the SOZΩ Brain Center collects and processes data, whether on individuals (including personal data in respect of individuals who are clients, intermediaries or other third parties that SOZΩ Brain Center interacts with, or any individual who is connected to those parties) or otherwise. Where the data held are on individuals, this document also sets out the rights of those individuals in respect of that personal data. This privacy notice is part of our commitment to ensure that we process any individuals' personal data in accordance with the applicable laws.

This Privacy Notice has been prepared in accordance with the provisions of the EU General Data Protection Regulation ("GDPR").

Any questions relating to this Privacy Notice or requests in respect of personal data should be directed to Mr Achilleas Trichias our Data Protection Officer (DPO) at [dpo@sozobraincenter.com](mailto:dpo@sozobraincenter.com)

### WHO WE ARE

SOZΩ Brain Center utilizes well-established and safe neuromodulation technologies, to support treatment of various neurological, mental and chronic diseases/conditions. These clinically validated, drug free, non-invasive healthcare technologies include Transauricular Vagus Nerve Stimulation (taVNS) and trans-Direct Current Stimulation (tDCS). Extensive scientific research is readily available, supporting their medical validity and effectiveness on patients suffering from a variety of diseases and disorders. For patients, key benefits include the lack of active substances and invasive procedures, which in turn lead substantial, long-term reductions in treatment costs. For doctors, we empower them to expand their practice by providing comprehensive neuromodulation training seminars, access to our multidisciplinary medical board, and the opportunity to franchise SOZΩ Brain Center in their own practice. Our brand name was derived from the ancient Greek word "SOZΩ" which means to save. Our vision therefore is to save ("σώζω") patients suffering from chronic, neurological and mental disorders through advanced neuromodulation techniques.

SOZΩ Brain Center recognizes the importance of protecting personal data and confidential information. SOZΩ Brain Center strives to protect personal data and apply high standards of conduct when it comes to privacy issues. It ensures that its employees are provided with the appropriate training to handle personal data promptly and by the applicable laws.

## WHO IS THE DATA CONTROLLER

The Data Controller responsible for keeping your personal data confidential and secure is SOZQ Brain Center (the "Data Controller"). The contact information of the Data Controller is as follows:

SOZQ Brain Center  
Address: 280 Strovolos Avenue, 2048, Nicosia, Cyprus  
Tel: +357 25864013  
Email: dpo@sozobraincenter.com  
Contact: Achilleas Trichias

## THE KIND OF INFORMATION WE COLLECT ABOUT YOU

SOZQ Brain Center collects and processes data in the context of providing healthcare services to its clients/patients. The categories of data it may collect and process, according to the particulars of each case, include:

Contact details (including names, postal addresses, email addresses and telephone numbers);

Personal Information (including date of birth, health history information for you and your family, details about your treatment, medicines you take and care, careers, legal representatives, insurers, emergency contact details);

Details of medical, lab and imaging records of treatments and care (including notes and reports about the individual's health);

Tests and results from investigations (including x-rays and other images, blood tests, laboratory tests etc.);

Information from people who care for you and know about you (i.e. relatives and health professionals);

Any additional information that can be required in the course the provision of our health services;

Bank and account details;

Information obtained through internet and telephone contact;

Insurance information and policies

Other personal and financial information obtained for Credit Worthiness.

## Important notice on Special Category Data (Sensitive Information)

SOZQ Brain Center collects and processes data according to our Privacy Notice that has been prepared in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and can be found on our website. This Privacy Notice is part of our commitment to ensure that we process any individuals' personal data in accordance with the applicable laws and regulations.

The personal data that SOZQ Brain Center processes include "Special Category Data" (which includes information on a person's race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data processed to uniquely identify a natural person, health data, disabilities, allergies, health conditions, data on a person's sex life or sexual orientation or data relating to a person's criminal record or alleged criminal activity).

## WHY WE NEED YOUR PERSONAL INFORMATION AND HOW WE USE IT

SOZQ Brain Center ensures that the data collected and processed is relevant to one or more processing activities and that SOZQ Brain Center does not collect or process more or less data than what is reasonably required for achieving the purpose of each processing activity. Furthermore, for each purpose of processing, there is always at least one lawful basis to secure that the rights of individuals are safeguarded by all means. The purposes of processing and the lawful basis of each processing activity are the following:

To take informed decisions about your healthcare and to ensure that your treatment is safe and effective;

To work effectively with other medical providers, organisations and doctors who may be involved in your care;

To review the care provided in order to ensure it is of the highest possible standard;

To improve individual care and diagnosis;

To develop and offer suitable new treatments and methods;

To enter into client relationships and for offering the healthcare services of SOZQ Brain Center;

To follow up on patient's post-op comments and deal with inquiries and complaints;

To promote, improve and expand the provision of SOZQ Brain Center's services;

Lawful Basis of Processing (in relation to points 1-9)

In cases where an individual has been provided with this Privacy Notice and provides personal data thereafter, the processing may be carried out on the basis of consent (including explicit consent).

Consent may be withdrawn at any time by writing to [dpo@sozobraincenter.com](mailto:dpo@sozobraincenter.com)

It is in the legitimate interests of SOZQ Brain Center as a provider of services in the healthcare sector to collect and process certain personal data, sensitive or otherwise in the context of providing those services.

The processing is necessary for SOZQ Brain Center to be able to offer any healthcare services and to perform and fulfil the contract/arrangement with the individual for the provision of the relevant healthcare services.

For marketing purposes including sending updates on important developments and news about SOZQ Brain Center's work and invitations to educational seminars and/or events.

**Lawful Basis of Processing:** In cases where an individual has been provided with this Privacy Notice and provides personal data thereafter, the processing may be carried out based on consent (including explicit consent).

Consent may be withdrawn at any time by writing to [dpo@sozobraincenter.com](mailto:dpo@sozobraincenter.com) or by unsubscribing by following the appropriate procedure which can be found in the relevant marketing material (e.g., by selecting the "unsubscribe" option in the email sent to you)

It is in the legitimate interests of SOZQ Brain Center as a provider of healthcare services to process personal data to communicate with persons on topics and events that may be of interest to those individuals.

To ensure the security of SOZQ Brain Center's systems, staff and premises (including the use of CCTV equipment in the public areas of the premises);

**Lawful Basis of Processing:** It is in the legitimate interests of SOZQ Brain Center to protect its business environment, staff, and premises from being misused or victimized in any way and to ensure that business operations run smoothly without unauthorized interruption.

By entering SOZQ Brain Center's premises, any individual automatically consents to the use of CCTV for monitoring purposes and to abide by the internal health and safety procedures of SOZQ Brain Center.

For the purposes of internal know-how and training of healthcare professionals, to prepare statistics and for research purposes.

**Lawful Basis of Processing:** It is in the legitimate interests of SOZQ Brain Center as a provider of healthcare services to process data for internal know-how and staff training.

Any other purpose(s) which has been agreed by or notified to you.

SOZQ Brain Center shall not carry out any automated decision-making activities, including profiling, using your personal information.

For further information on the use and storage of your data, please visit the SOZQ Brain Center Data Protection Policy at <https://sozobraincenter.com/>.

## WHO RECEIVES YOUR PERSONAL DATA

Reasonable endeavours are taken to ensure that the personal data is only accessible by those with a need for access to fulfil the purposes set out above. Requests for access to be restricted in any particular manner should be made to [dpo@sozobraincenter.com](mailto:dpo@sozobraincenter.com) and will be considered and, where possible with reference to legal and regulatory obligations, actioned.

Employees of SOZΩ Brain Center who are acquainted with the GDPR have signed the SOZΩ Brain Center Confidentiality and Non-Disclosure Statements.

Other healthcare providers in the private and public sector as may be required (including any hospitals, clinics, doctors or institutions providing healthcare services in relation to any matter on which SOZΩ Brain Center is instructed) where disclosure to that provider of services is considered necessary to fulfil the purposes set out above.

Any sub-contractors, agents or service providers of SOZΩ Brain Center.

Public and private organizations (including local authorities, insurers).

Independent Subcontractors (including dentists, opticians, pharmacists).

Third parties with whom SOZΩ Brain Center engages for the hosting of events or other marketing initiatives, educational seminars and research purposes.

Law enforcement agencies where considered necessary for SOZΩ Brain Center to fulfil legal obligations applicable to it;

Regulators or other governmental or supervisory bodies with a legal right to the material or a legitimate interest in any material.

Unless expressly declared in this Privacy Notice or with the prior consent of the individual, personal data collected from an individual will not be disclosed to any third party other than the above-named parties.

Where SOZΩ Brain Center is entering into an engagement with a third party pursuant to which data may be processed by that third party, SOZΩ Brain Center will seek to enter into an agreement with that third party setting out the respective obligations of each party and it will seek to be reasonably satisfied that the third party has measures in place equal to those of SOZΩ Brain Center to protect data against unauthorised or accidental use, access, disclosure, damage, loss or destruction.

## Transfer of Data to Third Countries

In the event that any such third party is outside of the European Union and where the data being transferred would include personal data that would be protected under applicable Data Protection regulation SOZΩ Brain Center will ensure that it meets the relevant requirements of that Data Protection regulation prior to carrying out any such transfer. This may include only transferring the data where SOZΩ Brain Centre is satisfied that:

the non-European Union country has Data Protection laws similar to the laws in the European Union.

the recipient has agreed through contract to protect the information in the same Data Protection standards as the European Union.

we have obtained consent from relevant data subjects to the transfer.

if transferred to the United States of America, the transfer will be to organizations that are part of the Privacy Shield.

the individual or institution to where the personal data is transferred, is part of the medical evaluation process & possible treatment of the patient.

## YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

Data subjects in the European Union (or any jurisdiction with equivalent legislation to the European Union General Data Protection Regulation) have certain rights in respect of their personal data (including the right to be informed, the right of access, the right of rectification, the right to erasure - also known as “the right to be forgotten”, the right to restrict processing, the right to data portability, the right to object and the right to withdraw your consent).

Any such individual wishing to exercise any rights under applicable data protection laws should send the request in the first instance to [dpo@sozobraincenter.com](mailto:dpo@sozobraincenter.com)

In response to such requests, SOZΩ Brain Center reserves the right to require the individual making the request to provide certain details about himself/herself so that SOZΩ Brain Centre can validate that the individual is indeed the person whom the data refers to. SOZΩ Brain Center will be required to respond to the request of the individual within 40 days and it will endeavour to do so wherever possible.

In any case in which a data subject chooses not to provide any personal data, or where any of the rights set out above are exercised to limit the processing of personal data, SOZΩ Brain Center may be unable to provide relevant services, or there may be restrictions on the services which can be provided.

## USE OF PERSONAL DATA IN LEGAL PROCEEDINGS

If it becomes necessary that SOZQ Brain Center has to take action against you for any reason whatsoever, including but not limited to recovering from you any money you may owe to SOZQ Brain Center, you expressly agree that the personal data provided by you can be relied upon in identifying and taking legal action against you.

## DATA RETENTION

SOZQ Brain Center retains personal data in accordance with the Data Retention Policy. Any personal data provided to SOZQ Brain Center is retained according to SOZQ Brain Center's procedure MSP002, Clause 4.2.4 – Control of Records - to fulfil the purposes for which the data was collected. After the fulfilment of the purposes for which the personal data was collected, such data will be destroyed, and a Destruction Certificate will be retained in SOZQ Brain Center records, unless destruction is prohibited for legal, regulatory or technical reasons.

Any requests for further information in relation to the continued processing of specific data and requests for destruction of data should be made to [dpo@sozobraincenter.com](mailto:dpo@sozobraincenter.com)

For further information on the retention and destruction processes of the Firm, please visit SOZQ Brain Center Data Retention Policy at <https://sozobraincenter.com/>

## CHANGES TO THIS PRIVACY NOTICE

SOZQ Brain Center keeps this Privacy Notice under review in order to ensure that it is in line with any changes to the laws relating to privacy and personal data. Any updates will appear on SOZQ Brain Center website at <https://sozobraincenter.com/>.

This Privacy Notice was last updated on 26<sup>th</sup> August 2020.

## COMPLAINTS PROCEDURE

SOZQ Brain Center has a *Data Protection Officer* and all inquiries in respect of this Privacy Notice or any requests to exercise any of the rights set out above should be directed to the Data Protection Officer via email at [dpo@sozobraincenter.com](mailto:dpo@sozobraincenter.com) or by post at:

SOZQ Brain Center  
Address: 280 Strovolos Avenue, 2048, Nicosia, Cyprus

## RIGHT TO LODGE A COMPLAINT WITH THE COMMISSIONER'S OFFICE.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact the Office of the Commissioner for Personal Data Protection, at:

1 Iasonos Str., 1082 Nicosia,  
P.O. Box 23378, 1682 Nicosia  
Tel: +357 22818456  
Fax: +357 22304565  
Email: commissioner@dataprotection.gov.cy

## WITHDRAWAL OF CONSENT

If you wish to withdraw your consent to the processing of your personal data please let us know in writing by sending a letter to the address of:

SOZΩ Brain Center

Address: 280 Strovolos Avenue, 2048, Nicosia, Cyprus

or [dpo@sozobraincenter.com](mailto:dpo@sozobraincenter.com). Please note that if you withdraw your consent, we may not be able to provide our health services to you.