



RĪGA STRADIŅŠ UNIVERSITY

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INTERNAL REGULATORY ENACTMENT

07.09.2026

RIGA

1-PB-9/63/2026

FAMILY HEALTH CENTRE PRIVACY POLICY

1. The Privacy Policy of the Family Health Centre (hereinafter – the Privacy Policy) provides information on the processing of personal data at the Family Health Centre, a structural unit of Rīga Stradiņš University (hereinafter – the Centre), and on the types of data that the Centre may process. The purpose and scope of the Privacy Policy:
 - 1.1. The purpose of the Privacy Policy is to protect the privacy of the data subject in order to ensure the fair and lawful processing of the data subject's personal data in a transparent manner, to inform the data subject about their rights and obligations relating to the processing of their personal data, and to provide information about the main purposes of personal data processing carried out, their legal basis, volume of data, data retention period and other information in accordance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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;
 - 1.2. The Privacy Policy sets out measures to ensure that the interests and freedoms of the data subject are protected and that personal data are processed fairly, lawfully and transparently;
 - 1.3. The Privacy Policy applies to the processing of personal data, regardless of the form or means by which the data subject provides the personal data (in person, electronically, on paper or by telephone);
 - 1.4. The Privacy Policy applies to the protection of the privacy and personal data of natural persons (the Centre's patients, including prospective, former and current patients; clients; visitors; cooperation partners and their representatives; interested persons; and website visitors).
2. Identity and contact details of the controller:
 - 2.1. The controller is Rīga Stradiņš University (hereinafter – RSU), unified registration No. 90000013771, legal address: 16 Dzirciema iela, Riga, LV-1007, rsu@rsu.lv, telephone: +37167409219;
 - 2.2. Contact information of the RSU Data Protection Officer: personu.dati@rsu.lv, telephone: +37167409144;
 - 2.3. Place of data processing: 16 Dzirciema iela, Riga, LV-1007.
3. Applicable law:
 - 3.1. Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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) (hereinafter – the Regulation);

- 3.2. Personal Data Processing Law;
- 3.3. Medical Treatment Law and the Cabinet Regulations issued pursuant thereto, including Regulation No. 265 of 4 April 2006, 'Procedures for Keeping Medical Documents';
- 3.4. Law on the Rights of Patients;
- 3.5. Other applicable laws relating to the processing and protection of the personal data of natural persons, and to the provision of medical or healthcare services.
- 4. Purposes of personal data processing, scope of processing, retention periods and data recipients. We process your personal data for one of the following purposes:
 - 4.1. Processing of personal data for the purpose of ensuring the medical treatment process. The purpose of processing personal data: provision and administration of medical or healthcare services;
 - 4.1.1. The personal data to be processed: name; personal identity number (or other equivalent identification number); declared address; actual place of residence; telephone number and/or email address; information on the healthcare services applied for and received, and their costs; information on contact persons or legal representatives, including their names and contact details; information on whether there is an insurance policy or any other benefit in accordance with the laws and regulations; information on the legal representatives of children; and information on debt obligations. When registering to receive services, a person may be asked to present a personal identity document and provide an email address and telephone number, as well as the number and validity period of the insurance policy.
 - 4.1.2. The legal basis for processing of personal data: the Centre processes special categories of client (data subject) data necessary for medical purposes and the provision and administration of healthcare services in accordance with Article 6(1)(b) of the Regulation (performance of a contract at the data subject's request) and Article 9(2)(h) (processing is necessary for the performance of a contract at the data subject's request, for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional). The data may be used to enable the Centre to defend its legitimate interests under Articles 6(1)(f) and 9(2)(f) of the Regulation, which state that processing is necessary for the establishment, exercise or defence of legal claims, or whenever courts are acting in their judicial capacity. In accordance with the Law on the Rights of Patients, the Accounting Law, etc.;
 - 4.1.3. The data retention period: information about services and their administration will be processed for five years, in accordance with the requirements of the Accounting Law. In the event of outstanding debts, the information will be retained for 10 years (the full limitation period) and for at least 3 years after the obligations have been fulfilled;
 - 4.1.4. The recipients of personal data: authorised employees of the Centre and medical staff, as well as state, municipal, and law enforcement agencies in cases provided for by laws and regulations, external service providers and partners of the Centre – processors, e.g. IT infrastructure maintainers, e-health portal, insurance service providers if necessary, using an insurance policy, etc. Providers of out-of-court debt recovery services or courts, where debt obligations have arisen towards the Centre;
 - 4.1.5. The purpose of processing personal data: provision of medical or healthcare services;
 - 4.1.6. The personal data to be processed: the patient's health status, information collected on past illnesses and episodes of treatment. The data subject may be referred for further medical examinations, and various measurements and tests may be carried out. The information will be compiled in the data subject's medical records. The information can be obtained via the e-health portal.

- 4.1.7. The legal basis for the processing of personal data: in accordance with Article 6(1)(b) of the Regulation, processing is necessary for the performance of a contract at the request of the data subject. In accordance with Article 9(2)(h), processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional, in compliance with the Medical Treatment Law and the Law on the Rights of Patients. In accordance with Article 6(1)(f) and Article 9(2)(f) of the Regulation, processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
- 4.1.8. The data retention period: in accordance with Cabinet Regulation No. 265, "Procedures for Keeping Medical Documents". The personal data retention period is 40 years from the date of the last entry or 15 years from the date of the patient's death;
- 4.1.9. The recipients of personal data: persons and authorities, law enforcement agencies, employers specified in Paragraph five of Section 10 of the Law on the Rights of Patients, in accordance with the provisions of Cabinet Regulation No. 950 of 25 August 2009, "Procedures for Investigation and Registration of Accidents at Work";
- 4.1.10. The purpose of processing personal data: provision of an electronic application for a visit via the "Book for consultation" platform, which is available on the www.piearsta.lv website;
- 4.1.11. The personal data to be processed: name, personal identity number, address, telephone number, email address. The user may additionally voluntarily provide other data related to the user in connection with the user's questions or comments, e.g. insurance policy number, insurer and policy validity period;
- 4.1.12. The legal basis for the processing of personal data: Article 6(1)(f) and Article 9(2)(a) of the Regulation – the data subject has given consent to the processing of his or her personal data;
- 4.1.13. The data retention period: as indicated on the website;
- 4.1.14. The recipients of personal data: authorised employees of the Centre and medical staff.
- 4.2. Processing of personal data for the purpose of handling claims, including complaints. The purpose of processing personal data: handling claims, including complaints.
 - 4.2.1. The personal data to be processed: name, personal identity number, address, telephone number, email address, information on the services received and the volume of data. The Centre shall have the right to process identifying information confirming the identity of the person and the right of representation, as well as to store information and data related to the specific document;
 - 4.2.2. The legal basis for the processing of personal data: Article 6(1)(f) of the Regulation – the legitimate interest of the Centre in defending its legal interests during the receipt and examination of claims;
 - 4.2.3. The data retention period: the principle of data minimisation will be observed; the Centre may retain the information processed by it for no longer than 2 years from the date of the incident;
 - 4.2.4. The recipients of personal data: authorised employees of the Centre, law enforcement agencies, supervisory authorities.
- 4.3. Recognition of the Centre's brand and services provided. The purpose of processing personal data: maintaining communication with existing and potential clients by providing information about the services offered by the Centre and their availability;
 - 4.3.1. Personal data to be processed: the Centre's information materials, news, photos of persons, events. Use of the Centre's social media platforms (e.g. Facebook and

Instagram), as well as the platforms available on the www.rsu.lv/gvc website, as well as stored in the Centre's archive with the aim of promoting the Centre's recognition.

- 4.3.2. The legal basis for the processing of personal data: Article 6(1)(a) and Article 9(2)(a) of the Regulation – the data subject has given consent to the processing of his or her personal data; Article 6(1)(f) of the Regulation – processing is necessary for the purposes of the legitimate interests pursued by the Centre or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Legitimate interest: Providing information about the Centre's services through events organised by the Centre, the mass media, its website and social media platforms. The rights and freedoms of the data subject shall be safeguarded. The published information shall be reviewed.
 - 4.3.3. The data retention period: until the purpose of processing has been achieved, except for information retained permanently in the Centre's archive.
 - 4.3.4. The recipients of personal data: authorised employees of the Centre and medical staff, operators of social media platforms; other users of social media platforms; and other third parties.
 - 4.3.5. Transfer of data outside the EU/EEA (to a third country): data may be transferred outside the EU/EEA by posting photos and videos on social media platforms;
 - 4.3.6. The Centre also processes personal data for administrative purposes: establishing contractual relationships, managing personnel matters and document circulation, promoting the controller's brand recognition, maintaining accounting processes, and managing corporate and administrative matters. To assess a person's suitability for a particular vacancy, the Centre collects information about the applicant's educational background and previous work experience.
5. Rights of the data subject:
- 5.1. The data subject shall have the right to access their personal data. The data subject must specify the particular time period and the data they wish to obtain from the Centre;
 - 5.2. The data subject shall have the right to request information about what personal data is held by the Centre, the purposes for which the personal data is processed, the categories of recipients of the personal data, how it has been obtained and to whom it has been transferred (for example, the Centre cannot provide the data subject with information about the relevant State institutions responsible for conducting criminal proceedings, subjects of operational activities, or other institutions in respect of which the disclosure of such information is prohibited by laws and regulations), how long the personal data will be stored, and information about the storage period or the criteria used to determine that period;
 - 5.3. The data subject shall have the right to have their data rectified and erased – should the data subject consider that the information held by the Centre is out of date, inaccurate or incorrect, the data subject shall have the right to request that their personal data be clarified, rectified or erased;
 - 5.4. The data subject must clearly indicate which data is to be clarified and provide the current information. If the data was not obtained directly from the data subject, the data subject must provide a justification explaining why the information to be rectified is considered inaccurate;
 - 5.5. The data subject shall have the right to request the erasure of their personal data or to object to the processing of such data if the data subject considers that the personal data has been processed unlawfully, or that it is no longer necessary in relation to the purposes for which it was collected or processed (the 'right to be forgotten');
 - 5.6. The Centre shall inform the data subject that their personal data cannot be erased if the processing of personal data is necessary to protect the vital interests of the data subject or

- another natural person, including life and health, or where the Centre or a third party needs to establish, exercise or defend legitimate interests, or where the processing of data is required in accordance with laws and regulations;
- 5.7. The data subject has the right to request the Centre to restrict the processing of specific data of the data subject if one of the following circumstances exists:
- 5.7.1. The accuracy of the personal data is contested by the data subject;
 - 5.7.2. The data processing is unlawful;
 - 5.7.3. The data are no longer necessary for the purposes for which they were collected or processed by the Centre, but are required by the data subject for the establishment, exercise or defence of legal claims;
 - 5.7.4. The data subject objects to the processing of their data. In this case, the Centre shall assess whether the legitimate grounds of the controller override those of the data subject.
- 5.8. Where the processing of the data subject's personal data has been restricted in accordance with Clause 5.7 of the Privacy Policy, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person or the important interests of the Centre. The Centre shall inform the data subject before lifting the restriction on the processing of the data subject's personal data.
- 5.9. The data subject may submit a request to exercise their rights:
- 5.9.1. in writing, in person, upon presentation of a personal identity document, to the Records Management and Archives Department at 16 Dzirciema iela, Riga, LV-1007;
 - 5.9.2. by email in free-form format, by writing to the official email rsu@rsu.lv;
 - 5.9.3. by email, by submitting a data subject rights request (Form LK-20) signed with a secure electronic signature to the RSU email address dokumenti@rsu.lv;
 - 5.9.4. by submitting a request through the Unified State and Local Government Services Portal (www.latvija.lv), including by submitting the request to RSU's official electronic address. The data subject shall have the right to access only their own personal data and not information relating to other natural persons (unless they are exercising the rights of the data subject on behalf of another natural person).
- 5.10. The data subject's right of access is exercised in relation to data, not documents. The data subject shall not have the right to demand the issue of a document or a copy of a document, except where this is justified by the need to obtain a copy of the document.
- 5.11. The data subject shall not have the right to request access to specific files, as there is a risk that, while exercising their rights as a data subject, they may obtain the personal data of other individuals.
- 5.12. Upon receipt of a request for the exercise of the data subject's rights, the Centre is obliged to verify the identity of the data subject and to assess the request. If the Centre cannot verify the identity of the data subject, or if there is reason to suspect that the identity presented by the data subject does not match their true identity, the Centre will not transfer the data.
- 5.13. The Centre may ask the data subject to provide additional information to ensure that the request is correctly executed and the selection of information is accurate.
- 5.14. The Centre may reject a request and refuse to provide information if the information has been deleted, or if the person making the request is not the data subject or cannot be identified. The Centre may reject a request and refuse to provide information if the data subject has refused to cooperate with the company, or if the Centre is unable to select the relevant information. Any refusal to provide information shall always be made in writing, in accordance with this Privacy Policy and/or applicable laws and regulations.

- 5.15. The Centre shall review the request received and provide a response within 1 (one) month of its receipt. If, for objective reasons (volume of information, etc.), the Centre cannot provide a response within 1 (one) month, the Centre shall inform the data subject accordingly, indicating the time period within which the information will be provided.
- 5.16. If a data subject submits a request and the Centre does not have the data subject's contact details enabling it to communicate with them during the processing of the request, the Centre shall prepare a written response within 1 (one) month, which shall be made available at the Centre.
- 5.17. If the response is sent by post, it shall be addressed to the data subject (the person whose personal data has been requested) and sent by registered mail. If the response is given electronically, it is signed with a secure electronic signature (if the application has been submitted with a secure electronic signature).
6. Data subject's consent to data processing and the right to withdraw consent:
 - 6.1. The data subject shall give their consent to the processing of personal data, where the legal basis is consent, in writing in person, by sending a document in paper or electronic format, or by confirming their consent electronically on the registration website;
 - 6.2. The data subject shall have the right to withdraw their consent at any time in the same manner in which it was given. Following the withdrawal of consent, the further processing of personal data based on that consent for the specific purpose shall cease;
 - 6.3. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
7. Personal data protection:
 - 7.1. The Centre shall process personal data using available technological solutions, taking into account the existing privacy risks and the organisational, technical and financial resources available to the Centre.
 - 7.2. The Centre shall implement, regularly review and improve measures for the protection of personal data to ensure that data subjects' personal data are protected against unauthorised access, accidental loss, disclosure or destruction.
 - 7.3. The Centre's cooperation partners acting as data processors shall ensure compliance with the requirements applicable to the processing and protection of personal data in accordance with applicable laws and regulations and shall not use personal data for any purposes other than fulfilling their contractual obligations on behalf of the Centre.
 - 7.4. In the event of a personal data breach, where the breach is likely to result in a high risk to the rights and freedoms of the data subject, the Centre shall notify the relevant data subject in accordance with the requirements of the Regulation.
8. Submission of complaints:
 - 8.1. If the data subject has any concerns about how the Centre uses their personal data, they may lodge a complaint with the Centre at rsu@rsu.lv;
 - 8.2. The data subject shall have the right to lodge a complaint with the supervisory authority regarding the processing of their personal data by the Centre if they consider that their personal data have been processed unlawfully. The supervisory authority is the Data State Inspectorate, 17 Elijas iela, Riga, LV-1050, Latvia, email: pasts@dvi.gov.lv, <https://www.dvi.gov.lv/lv>. Telephone: 67223131.

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